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**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION**

In re:

CRESTLLOYD, LLC,

Debtors and Debtors in Possession.

Case No.: 2:21-bk-18205-DS

Chapter 11 Case

**FOURTH INTERIM APPLICATION OF
LEVENE, NEALE, BENDER, YOO &
GOLUBCHIK L.L.P. FOR APPROVAL
OF FEES AND REIMBURSEMENT OF
EXPENSES; DECLARATION OF
DAVID B. GOLUBCHIK IN SUPPORT
THEREOF**

Hearing

Date: December 12, 2024

Time: 1:00 p.m.

Place: Courtroom 1639

255 E. Temple Street

Los Angeles, CA 90012

VIA ZOOMGOV ONLY

1 Levene, Neale, Bender, Yoo & Golubchik L.L.P. (“LNYG”), general bankruptcy counsel
2 to Crestlloyd LLC, the debtor and debtor in possession in the above-referenced bankruptcy case
3 (the “Debtor”), hereby submits its Fourth Interim Application for Approval of Fees and
4 Reimbursement of Expenses (the “Application”) for services rendered and expenses incurred
5 during the pendency of the Debtor’s chapter 11 bankruptcy case for the period of November 1,
6 2023 through and including October 31, 2024 (the “Covered Period”).

7 **I.**

8 **FEES AND EXPENSES INCURRED AND NOTICE**

9 **A. REQUEST FOR ALLOWANCE AND PAYMENT OF FEES AND**
10 **REIMBURSEMENT OF EXPENSES.**

11 During the Covered Period, LNYG incurred fees in the amount of \$99,061.50 and expenses
12 in the amount of \$3,090.96 for total fees and expenses in the amount of \$102,152.46. Accordingly,
13 LNYG is owed a balance of \$102,152.46 for fees and expenses incurred during the Covered
14 Period. LNYG respectfully submits that its requested fees and expenses are reasonable and should
15 be approved on an interim basis. Accordingly, pursuant to the Application, LNYG is seeking
16 authority for the Debtor to pay LNYG the unpaid balance of \$102,152.46 for fees and expenses
17 incurred during the Covered Period.

18 **B. PROPER NOTICE.**

19 Pursuant to Fed. R. Bankr. P. 2002(a)(6) and the applicable Local Bankruptcy Rules,
20 LNYG served notice of this Application and the amount of fees and expenses sought herein upon
21 the Debtor, the Office of the United States Trustee (the “OUST”), all creditors, and all parties who
22 have requested special notice.

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II.

BRIEF NARRATIVE HISTORY OF THE PRESENT

POSTURE OF THE DEBTOR'S CHAPTER 11 CASE, CIRCUMSTANCES

THAT LED TO THE FILING OF THE DEBTOR'S CHAPTER 11 CASE, AND

SIGNIFICANT EVENTS WHICH OCCURRED DURING THE COVERED PERIOD

A. BACKGROUND

On October 26, 2021 (the “Petition Date”), the Debtor commenced its bankruptcy case by filing a voluntary petition under Chapter 11 of the Bankruptcy Code. The Debtor is operating its estate and managing its financial affairs as a debtor in possession pursuant to Sections 1107 and 1108 of the Bankruptcy Code.

On the Petition Date, the Debtor's primary asset was a piece of residential real property that it developed located at 944 Airole Way, Los Angeles CA 90077 (the "Property"). Unfortunately, before the Property could be completed and sold (either as a fully completed or nearly completed project), the Debtor's primary secured lender, Hankey Capital, LLC ("Hankey"), as well as a number of other junior secured lenders and mechanic's lien holders (the "Mechanic's Lien Creditors"), initiated a multitude of state court actions against the Debtor seeking, among other things, to recover amounts allegedly owed and to foreclose on the Property. In connection with its action, Hankey sought and obtained the appointment of a receiver (the "Receiver") for the Property.

In order to protect its equity in the Property, to address the myriad of litigation and claims against it, and to regain control of the Property from the Receiver, the Debtor filed its bankruptcy case on the Petition Date of October 26, 2021, which stayed the foreclosure sale. It was imperative for the Debtor to regain possession and control over the Property and to obtain the breathing spell afforded by the automatic stay not only to stop the foreclosure and protect equity in the Property, but also to provide time and a means for the Debtor to sell the Property.

1. Alleged Claims Secured by the Property

i. Inferno Investments Inc.

Pursuant to a Proof of Claim (the “Inferno POC”) filed by Inferno Investments, Inc. (“Inferno”), Inferno asserts a claim in the amount of \$20,902,106.12, which Inferno asserts is

1 secured by a Deed of Trust that was recorded on March 13, 2013. (See Claim No. 11).

2 On January 1, 2016, the Debtor and Inferno entered into an agreement (the “Subordination
3 Agreement”) whereby the parties agreed that proceeds from the sale of the Property would be
4 distributed in the following manner: “First to repay the loan(s) obtained from a bank or third party
5 parties (excluding [the Debtor] and Inferno) and all other unpaid costs of construction of the
6 [Property]. Second, to [the Debtor] and Inferno, pro rata, in repayment of any loans owing them,
7 together with simple interest thereon at the rate of eight percent (8%) per annum....” [See Dkt. 325,
8 Exhibit “5”, ¶ 3].

9 ii. The Mechanic’s Lien Creditors

10 After the initial financing from Inferno, the Debtor commenced construction of the
11 Property. In that respect, the following parties provided goods and/or services in order to improve
12 the Property: J&E Texture, Inc., American Truck & Tool Rentals Inc., Kennco Plumbing Inc., JMS
13 Air Conditioning, Parquet by Dian, Powertek Electrical Inc., and BMC West LLC (collectively
14 referred to herein as the “Mechanic’s Lien Creditors”).

15 iii. Hankey Capital, LLC

16 Pursuant to Claim No. 20 filed by Hankey (“Hankey POC”), Hankey asserts a claim in the
17 amount of \$122,638,623.41, which Hankey asserts is secured by two separate Deeds of Trust dated
18 November 6, 2018 (the “Principal Hankey DOT”) and December 10, 2019, respectively. (See Claim
19 No. 20). The Principal Hankey DOT stems from a loan Hankey provided to the Debtor in the initial
20 amount of \$82,500,000.00 on or around October 31, 2018 (the “Principal Hankey Loan”). (See
21 Claim No. 20, Ex. A). The Principal Hankey Loan is evidenced by a promissory note. (*Id.*).

22 iv. Yogi Securities Holdings, LLC

23 Pursuant to a Proof of Claim (“Yogi POC”) filed by Yogi Securities Holdings, LLC
24 (“Yogi”), Yogi asserts a claim in the amount of \$24,385,366.77, which Yogi asserts is secured by
25 a Deed of Trust dated August 30, 2019. (See Claim No. 27).

26 v. Hilldun Corporation

27 Pursuant to a Proof of Claim (“Hilldun POC”) filed by Hilldun Corporation (“Hilldun”),
28 Hilldun asserts a claim in the amount of \$5,000,000, which Hilldun asserts is secured by a Deed of

1 Trust dated September 4, 2020. (See Claim No. 9).

2 **2. The Debtor's Efforts to Sell the Property.**

3 i. Turnover of Property from Receiver and Negotiations Regarding Access to
4 the Property.

5 When LNYBG was employed as the Debtor's general bankruptcy counsel, the Property was
6 under the control of a Receiver. To that end, immediately after the Petition Date, the Debtor, with
7 assistance of LNYBG and its manager, Sierra Constellation Partners, LLC ("SCP"), quickly
8 negotiated an interim stipulation with Hankey and the Receiver regarding access to the Property
9 (the "Receivership Stipulation") to facilitate efforts to employ professionals to assist the Debtor in
10 marketing and selling the Property, and, thereafter, the Receiver voluntarily turned over the
11 Property and all other property of the estate on December 1, 2021.

12 ii. The Employment of the Real Estate Brokers and Auctioneer

13 After resolving the turnover issues, the Debtor then sought to employ certain professionals
14 to assist the Debtor in marketing and selling the Property. Pursuant to this strategy, the Debtor
15 entered into employment agreements with The Beverly Hills Estates and Compass (together, the
16 "Brokers") on or around December 3, 2021, and Concierge Auctions, LLC ("Auctioneer") on or
17 around December 13, 2021. The specific duties of the Brokers and Concierge included: (1)
18 marketing and showing the Property to prospective buyers; (2) assisting the Debtor in obtaining
19 and providing due diligence materials to prospective buyers; (3) notifying prospective buyers of
20 the intended online auction (the "Auction") of the Property and the bid procedures approved by the
21 Court (the "BK Bid Procedures") governing the Auction¹; (4) receiving bids from prospective
22 buyers; (5) conducting the Auction of the Property pursuant to BK Bid Procedures approved by the
23 Court with the ultimate sale subject to Court approval; (6) consulting with the Debtor and its
24 professional advisors regarding the foregoing; and (7) performing any other services which may be
25 appropriate in connection with the Brokers and Auctioneer's retention by the Debtor. Thereafter,

27 ¹ On January 10, 2022, over the objection of Yogi and Inferno, the Court entered an order granting the Debtor's
28 motion to approve the BK Bid Procedures and entered an order granting the Debtor's motion to approve the Debtor's
proposed bidding procedures. [Dkts. 88, 97, 98, and 105].

the Debtor filed an application to approve the employment of the Brokers and Auctioneer, which was approved by the Court on January 10, 2022. [Dkts. 74 and 104].

iii. Sale of the Property

The Brokers and Auctioneer were successful in selling the Property. On March 28, 2022, the Court entered an order (the “Sale Order”), over the objection of numerous alleged secured creditors, granting the Debtor’s March 8, 2022 motion seeking authority to sell the Property (the “Motion to Sell”). [Dkts. 142, 191, 192, 193, 196, 198, 201, 202, 208, and 247]. Pursuant to the Sale Order, the Debtor realized \$126 million, plus a rebate of \$11.970 million from the Auctioneer, for a total of \$137.97 million dollars in consideration (the “Sale Proceeds”).

After the Court granted the Motion to Sell, two separate parties, Inferno and Nile Niami, appealed the Sale Order (herein referred to as the “Appeals”). [Dkts 249 and 279]. In response, the Debtor filed its own appeal in order to preserve certain issues on appeal (herein referred to as the “Cross-Appeal”). [Dkt. 272]. Since the entry of the Sale Order (and described in greater detail below), the Debtor has been engaged in extensive litigation involving the distribution of the Sale Proceeds to its alleged secured creditors.

B. THE APPEALS

The appeal filed by Inferno was voluntarily dismissed by Inferno after Inferno filed that certain “*Stipulation to Dismiss Appeal Filed by Inferno Investment, Inc. Pursuant to Federal Rule of Bankruptcy Procedure 8023*” (the “Inferno Stipulation”). Shortly thereafter, the Debtor voluntarily dismissed the Cross-Appeal after it filed that certain “*Stipulation to Dismiss Appeal Filed by Crestlloyd, LLC Pursuant to Federal Rule of Bankruptcy Procedure 8023*” (the “Crestlloyd Stipulation”).

C. THE ADVERSARY PROCEEDING

On June 9, 2022, Inferno initiated an adversary proceeding titled Inferno v. Crestlloyd LLC, et al., 2:22-ap-01125-DS (the “Adversary Proceeding”) when Inferno filed that certain “*Complaint Of Inferno Investment, Inc. For: (1) Declaratory Relief; (2) Unfair Business Practices; (3) Disallowance of Claims; And (4) Recission*” (the “Adversary Complaint”) [Adv. Dkt. 1].

1 **1. Background – Motion to Pay Hankey Capital**

2 On May 24, 2022, the Debtor, with the assistance of LNYBG, filed that certain “*Motion*
3 *For Authority To Disburse Funds to Hankey Capital, LLC, A Senior Secured Creditor*” (the
4 “Motion to Pay Hankey”) [Dkt. 325], whereby the Debtor sought the Court’s authority to disburse
5 \$103,837,545.86 to Hankey, which amount represented the principal, interest, and foreclosure fees
6 owed to Hankey in consideration for the Principal Hankey Loan. The Debtor argued that the Motion
7 to Pay Hankey was justified based on the fact that (1) as a result of the Subordination Agreement,
8 the Principal Hankey Loan is senior to the claims asserted by Inferno, Yogi, and Hilldun; and (2)
9 making such a distribution was in the best interest of the estate because if the Debtor did not satisfy
10 the Principal Hankey Loan, then the Principal Hankey Loan would continue to accrue interest at a
11 rate of approximately \$36,666 per day.

12 In response, Inferno filed an opposition to the Motion to Pay Hankey (the “Inferno
13 Opposition to the Motion to Pay Hankey”) [Dkt. 337] through which Inferno argued that it would
14 be improper for the Court to grant the Motion to Pay Hankey due to alleged issues concerning the
15 enforceability of the Subordination Agreement. (*See* Opposition to Motion to Pay Hankey; 2:2-19).
16 Moreover, Yogi filed its own limited opposition to the Motion to Pay Hankey (the “Yogi
17 Opposition to Motion to Pay Hankey”) [Dkt. 338] through which Yogi argued that the Court should
18 not grant the Motion to Pay Hankey to the extent that the Debtor sought authorization to pay
19 Hankey anything over \$82.5 million, the principal on the Principal Hankey Loan, because there
20 existed a good faith dispute regarding the priority of the interest on the Principal Hankey Loan.

21 Thereafter, the Debtor filed its own reply to both the Inferno Opposition to the Motion to
22 Pay Hankey and the Yogi Opposition to Motion to Pay Hankey [*See* Dkt. 340].

23 After a hearing on the Motion to Pay Hankey was held on May 26, 2022 (the “Hearing on
24 the Motion to Pay Hankey”), the Court entered an order (1) authorizing the Debtor to pay Hankey
25 the sum of \$82.5 million on account of Hankey’s asserted secured claim(s) in the Debtor’s Chapter
26 11 bankruptcy case; (2) ordering that such payment would be without prejudice to any and all
27 parties’ rights to assert claims and defenses as may be appropriate, including but not limited to the
28 right to clawback any portion of the monies paid; and (3) continuing the Hearing on the Motion to

1 Pay Hankey to June 23, 2022 in order for the Court to consider payment of any amounts in excess
2 of the \$82.5 million [*See* Dkt. 348]. In response, on June 2, 2022 the Debtor filed its Supplemental
3 Brief in Support of the Motion to Pay Hankey [Dkt. 355] further arguing that it should be authorized
4 to disburse funds to Hankey in the total amount of \$103,837,545.86. Thereafter, on June 9, 2022,
5 both Yogi and Inferno filed their own supplemental briefs in opposition to the Motion to Pay
6 Hankey (the “Supplemental Briefs IOT Motion to Pay Hankey”) [*See* Dkts. 359, 361]. However,
7 in addition to filing its own supplemental brief in opposition to the Motion to Pay Hankey [Dkt.
8 361], Inferno initiated the Adversary Proceeding by filing the Adversary Complaint on June 8, 2022
9 [Adv. Dkt. 1]. Consequently, in its Reply to the Supplemental Briefs IOT Motion to Pay Hankey
10 [Dkt. 365], the Debtor submitted that it could not make the distribution contemplated by the Motion
11 to Pay Hankey because Inferno’s commencement of the Adversary Proceeding included an
12 objection to Hankey’s POC and, therefore, precluded the Debtor from making the full distribution
13 contemplated by the Motion to Pay Hankey.

14 To date (and as described in greater detail below), the material issues concerning the
15 characterization and priority of the secured claims are being resolved through the Adversary
16 Proceeding.

17 **2. The Adversary Complaint**

18 Through the Adversary Complaint, Inferno’s argues that the Inferno POC maintains priority
19 over all other secured claims based on the following set of facts: (1) Inferno loaned money to the
20 Debtor in order for the Debtor to acquire the Property; (2) after lending the Debtor money, Inferno
21 and the Debtor entered into a Memorandum of Agreement (the “MOA”) whereby the parties agreed
22 that the proceeds from the sale of the Property would be used to repay loans obtained from a bank
23 or third parties, before the Debtor and Inferno receive any proceeds, and that Inferno’s written
24 approval was required before its interest in the Property could be subordinated to that of other
25 secured lenders; but (3) the MOA is of no force and effect because the Debtor committed fraud and
26 repudiated the MOA by misappropriating tens of millions of dollars that should have been used for
27 the Property, such that (4) Inferno’s secured claims maintain priority over the Debtor’s other
28 secured creditors. (*See* Adversary Complaint). On August 10, 2022, the Debtor filed its answer to

1 the Adversary Complaint, denying the material allegations presented in the Adversary Complaint
2 and asserting various affirmative defenses [Adv. Dkt. 26].

3 **3. Debtor's Cross-Claim**

4 In addition to assisting the Debtor in connection with its answer to the Adversary
5 Complaint, in response to the Adversary Complaint, the Debtor, with the assistance of LNYBG,
6 continued to investigate the nature, extent, and validity of each of the secured claims and the alleged
7 liens securing them. Through diligent analysis and investigation, LNYBG determined that
8 misconduct on the part of the Debtor's principals and entities controlled by the Debtor's principals,
9 Inferno, Yogi, Hilldun, and certain principals of the Debtor's secured creditors (collectively, the
10 "Cross-Complaint Defendants"), caused injury to the Debtor. Accordingly, the Debtor filed its own
11 cross-complaint in the Adversary Proceeding (the "Cross-Complaint") [Adv Dkt. 27] seeking
12 redress for such injuries caused by the Cross-Complaint Defendants pursuant to claims (1) to
13 recharacterize debt as equity, (2) for equitable subordination, (3) for declaratory relief, (4) for
14 breach of fiduciary duties, and (5) to disallow certain claims.

15 **4. Yogi's Counterclaim**

16 In response to the Cross-Complaint, Yogi filed its own first amended counterclaim against,
17 amongst other parties, the Debtor (the "Yogi Counterclaim") [Adv. Dkt. 55], for which the Debtor
18 filed its own Answer to on October 12, 2022 [Adv. Dkt. 68].

19 **5. Settlement Of Claims Against Englanoff Defendants.**

20 Among the claims asserted by the Debtor in the Adversary Proceedings were claims for
21 avoidance of fraudulent conveyances in favor of Justine Englanoff, Nicole Englanoff, and
22 Jacqueline Englanoff (collectively, the "Englanoff Defendants"). After extensive settlement
23 discussions, the Debtor and Englanoff Defendants reached a settlement. After execution of a
24 settlement agreement, the Debtor filed a motion to approve the settlement. The Motion was
25 approved pursuant to an order entered on October 23, 2023 [Dkt. 533]. The settlement amount has
26 been paid to the estate and being maintained pending further order of this Court.

27 **6. Mediation**

28 Notwithstanding continued litigation, the parties to the Adversary Proceeding agreed to

1 attempt to resolve their claims through mediation. Numerous sessions of mediation were held
2 before the Honorable Sheri Bluebond, United States Bankruptcy Judge. Such sessions were
3 attended by Hankey and Inferno, since those are the primary parties to the dispute and, absent a
4 resolution among such parties, it would not be productive to include others. Notwithstanding Judge
5 Bluebond's continued efforts, an agreement was not reached and the mediation was concluded.

6 Litigation commenced once again thereafter. The parties held their early meeting of counsel
7 and prepared initial disclosures. Certain written discovery has been propounded and responded to.
8 In addition, the parties have entered into a stipulation to allow Inferno to amend its complaint
9 against Hankey, which stipulation was approved pursuant to order of this Court entered on October
10 28, 2024. [Dkt. 286].

11 A status conference in the adversary proceeding is currently scheduled for January 25, 2025.

12 **D. OTHER SIGNIFICANT EVENTS DURING THE BANKRUPTCY CASE.**

13 **1. Motion to Pay Certain Secured Creditors**

14 On May 26, 2022, LNBYG assisted the Debtor in filing that certain “*Motion For Authority*
15 *to Pay Certain Senior Secured Creditors*” (the “Motion to Pay Mechanic’s Lien Creditors”) [Dkt.
16 319]. Through the Motion to Pay Mechanic’s Lien Creditors, the Debtor requested that the Court
17 authorize the Debtor to pay amounts owed to the Mechanic’s Lien Creditors in the following
18 amounts:

- 19 (a) J&E Texture, Inc. → \$292,300.86
20 (b) American Truck & Tool Rentals Inc. → \$160,000.00²
21 (c) Kennco Plumbing Inc. → \$85,560.17
22 (d) JMS Air Conditioning → \$51,290.00
23 (e) Parquet by Dian → \$40,846.00
24 (f) Powertek Electrical Inc. → \$40,480.00

25
26 _____
27 ² This amount is **reduced** from the secured claim in the amount of \$188,087.09 asserted by American Truck & Tool
28 Rentals Inc. pursuant to that certain “*Stipulation With American Truck & Tool Rentals Inc. Re: Allowance And
Payment Of Claim*” (the “American Stipulation”) [Dkt. 304] that was approved by the Court on May 5, 2022 [Dkt.
305].

1 (g) BMC West LLC → \$2,399.00

2 After holding a hearing on the Motion to Pay Mechanic's Lien Creditors, the Court entered
3 an order granting the Motion to Pay Mechanic's Lien Creditors [Dkt. 354].

4 **2. Vesta Administrative Expense Claim, Related Litigation, and Compromise**

5 On June 3, 2022, Showroom Interiors, LLC dba Vesta ("Vesta") filed that certain "Request
6 for Payment of Chapter 11 Administrative Expenses of Showroom Interiors, LLC" (the "Vesta
7 Admin Expense Request") [Dkt. 357] whereby Vesta requested the allowance and payment of an
8 administrative claim in the amount \$320,283.04 as a result of damages allegedly caused by the
9 Debtor to furniture allegedly leased by the Debtor from Vesta. In response, the Debtor filed a
10 limited objection to the Vesta Admin Expense Request (the "Limited Objection to Vesta Admin
11 Expense Request") [Dkt. 367], whereby the Debtor disputed the extent and validity of the Admin
12 Expense Request, and requested additional time to investigate the arguments presented by Vesta in
13 support of the Vesta Admin Expense Request. One week later, Vesta filed a reply to the Limited
14 Objection to Vesta Admin Expense Request [Dkt. 383].

15 On July 21, 2022, the Court held a hearing to consider the Vesta Admin Expense Request
16 (the "Hearing on the Vesta Admin Expense Request"), which resulted in the Court entering an
17 Order (the "Continuation Order") continuing the Hearing on the Vesta Admin Expense Request to
18 September 8, 2022 in order for Vesta and the Debtor (1) to attempt to settle the Vesta Admin
19 Expense Request; or, (2) if settlement was not possible, give the parties additional time to draft
20 supplemental briefs in support of, or opposition to, the Vesta Admin Expense Request [Dkt. 391].

21 After the Court entered the Continuation Order, the Debtor and Vesta entered into
22 settlement negotiations, the terms of which are memorialized in that certain "Stipulation Resolving
23 Request for Payment of Chapter 11 Administrative Expenses of Showroom Interiors, LLC dba
24 Vesta" (the "Vesta Stipulation") [Dkt. 409]. On September 21, 2022, the Court entered an order
25 approving the Vesta Stipulation [Dkt. 413].

26 **3. Monthly Operating Reports**

27 Throughout the Covered Period, LNYG assisted the Debtor in preparing its Monthly
28 Operating Reports (collectively, the "MORs").

1 **4. SCP's Monthly Fee Statements.**

2 Throughout the Covered Period, LNYBG assisted SCP in drafting its monthly fee
3 statements (the collectively, the "Monthly Fee Statements" and each a "Monthly Fee Statement")
4 for each month of employment.

5 **5. Additional Motions and Pleadings Filed by Edward Roark Schwagerl.**

6 Edward Roark Schwagerl, who is not a creditor in this case and not a party to any
7 proceedings, has filed numerous motions and pleadings asserting an interest in the Property and
8 seeking relief related thereto. LNYBG opposed the motions, where appropriate. In other instances,
9 the Court issued its own orders denying the relief requested by Mr. Schwagerl.

10 **E. FEES AND EXPENSES PREVIOUSLY REQUESTED.**

11 On May 5, 2022, LNYBG filed that certain "*First Interim Application of Levene, Neale,*
12 *Bender, Yoo & Golubchik L.L.P. For Approval of Fees and Reimbursement of Expenses*" (the "First
13 Interim Fee App") [Dkt. 306] whereby LNYBG sought the Court's approval to collect the fees
14 incurred by LNYBG and reimbursement of expenses incurred during the pendency of the Debtor's
15 chapter 11 bankruptcy case for the period of the Petition Date of October 26, 2021 through and
16 including April 15, 2022.

17 Thereafter, Inferno filed a limited opposition to LNYBG's First Interim Fee App (the
18 "Limited Opposition to First Interim Fee App") [Dkt. 314], arguing that the Court should not
19 approve the First Interim Fee Application to the extent that LNYBG sought authorization to pay
20 fees and costs exceeding the amount for restructuring costs for professional and UST fees set forth
21 in the budget (the "Budget") approved by Hankey as lender on the Debtor's debtor in possession
22 loan (the "DIP Loan") and by the Court pursuant to a final order granting the motion to approve
23 the DIP Loan. (*See* Limited Opposition to First Interim Fee App; 1:24-28). In response Inferno's
24 limited objection to First Interim Fee App, LNYBG filed its reply to the Limited Opposition to
25 First Interim Fee App (the "Reply to Limited Opposition to First Interim Fee App") [Dkt. 320]
26 arguing, in short, that there were no Budget restrictions on the amount available to pay LNYBG or
27 UST fees because the DIP Loan was paid in full. (*See* Reply to Limited Opposition to First Interim
28 Fee App 3; 7-13.).

1 After the hearing on LNYBG's First Interim Fee App on May 26, 2022 (the “Hearing on
2 the First Interim Fee App”), the Court entered an order approving the LNYBG's First Interim Fee
3 App, in full, and authorizing the Debtor to pay the \$549,361.47 sought by LNYBG pursuant to its
4 First Interim Fee App [See Dkt. 349]. Thereafter, the foregoing amount was paid to LNYBG.

5 On November 10, 2022, LNYBG filed that certain “*Second Interim Application of Levene,*
6 *Neale, Bender, Yoo & Golubchik L.L.P. For Approval of Fees and Reimbursement of Expenses*”
7 (the “Second Interim Fee App”) [Dkt. 439] whereby LNYBG sought the Court's approval to collect
8 the fees incurred by LNYBG and reimbursement of expenses incurred during the pendency of the
9 Debtor's chapter 11 bankruptcy case for the period of the Petition Date of April 16, 2022 through
10 and including October 31, 2022. Pursuant to the Second Interim Fee App, LNYBG sought fees in
11 the amount of \$330,744.00 and expenses in the amount of \$23,558.77 for total fees and expenses
12 in the amount of \$354,302.77.

13 On November 22, 2022, Andre Mario Smith filed a motion to accept his “settlement” offer
14 and transfer the Property to him which also included an objection to the Second Interim Fee App.
15 [Dkt. 446]. LNYBG responded to the pleading.

16 In addition, the US Trustee raised certain information objections to the Second Interim Fee
17 App, which were resolved pursuant to a stipulation with LNYBG. [Dkt. 448]. The stipulation was
18 approved pursuant to an order entered on November 29, 2022. [Dkt. 451].

19 On December 2, 2022, Inferno filed its reservation of rights with respect to the Second
20 Interim Fee App. [Dkt. 453].

21 After the continuance of the hearing on the Second Interim Fee App to December 8, 2023,
22 on December 8, 2023, this Court entered its order approving the Second Interim Fee App and
23 allowing fees of \$300,000 and costs of \$21,221.81. [Dkt. 457]. The allowed fees and costs were
24 paid by the estate.

25 On November 6, 2023, LNYBG filed that certain “*Third Interim Application of Levene,*
26 *Neale, Bender, Yoo & Golubchik L.L.P. For Approval of Fees and Reimbursement of Expenses*”
27 (the “Second Interim Fee App”) [Dkt. 547] whereby LNYBG sought the Court's approval to collect
28 the fees incurred by LNYBG and reimbursement of expenses incurred during the pendency of the

1 Debtor's chapter 11 bankruptcy case for the period of November 1, 2022 through and including
2 October 31, 2023. Pursuant to the Third Interim Fee App, LNYG sought fees in the amount of
3 \$114,614.50 and expenses in the amount of \$3,538.94 for total fees and expenses in the amount of
4 \$118,153.44.

5 On November 16, 2023, Inferno filed its reservation of rights with respect to the Second
6 Interim Fee App. [Dkt. 542].

7 On December 1, 2023, this Court entered its order approving the Third Interim Fee App and
8 allowing the requested fees and costs. [Dkt. 545]. The allowed fees and costs were paid by the
9 estate.

10 **F. CASH ON HAND AND ESTIMATED AMOUNT OF OTHER ACCRUED AND**
11 **UNPAID EXPENSES OF ADMINISTRATION.**

12 LNYG is informed and believes that, as of the date hereof, the Debtor sufficient funds on
13 hand, which is separate from the approximately \$37.5 million in sales proceeds maintained in a
14 segregated account. LNYG is further informed and believes that (1) the other professionals
15 employed by the estate were paid in full upon the close of escrow for the sale of the Property, (2)
16 SCP/Lawrence R. Perkins, the Debtor's Non-Member Manager, has generally been paid current on
17 a monthly basis pursuant to notice and payment procedures approved by the Court [Dkts. 70 and
18 77], and (3) the Debtor is generally current on all other post-petition obligations. As a result, more
19 than sufficient funds exist to pay the fees and costs requested in this Application.

20 **G. BRIEF NARRATIVE STATEMENT OF SERVICES RENDERED, TIME**
21 **EXPENDED, AND FEES CHARGED FOR EACH BILLING CATEGORY.**

22 When recording its time, LNYG places all time entries for fees into one of fourteen
23 categories. These categories consist of (1) Asset Analysis and Recovery, (2) Asset Disposition, (3)
24 Business Operations, (4) Case Administration, (5) Claims Administration and Objections, (6)
25 Employee Benefits/Pensions, (7) Fee/Employment Applications, (8) Fee/Employment Objections,
26 (9) Financing, (10) Relief from Stay, (11) Meetings of Creditors, (12) Plan and Disclosure
27 Statement, (20) Other Litigation, and (99) Miscellaneous. Inevitably, certain time entries do not fit
28 neatly into any one category while other time entries cross over into more than one category.

1 LNYBG does its best to place time entries into categories which accurately reflect the work
2 performed. However, it is inevitable that there will be some time entries that have been placed into
3 the incorrect category or where various time entries dealing with the same subject matter have been
4 placed into multiple categories.

5 **1. ASSET ANALYSIS AND RECOVERY (01).**

6 During the Covered Period, LNYBG did not bill any time in this category.

7 **2. ASSET DISPOSITION (02).**

8 During the Covered Period, LNYBG billed 0.8 hours and incurred \$566.00 of fees in this
9 category. Fees in this category addressed analyzing and responding to Mr. Smith's numerous
10 pleadings seeking to convey the Property to him and discussing the same with counsel for the buyer.
11 Such requests were ultimately denied by the Court.

12 **3. BUSINESS OPERATIONS (03).**

13 During the Covered Period, LNYBG did not bill any time in this category.

14 **4. CASE ADMINISTRATION (04).**

15 During the Covered Period, LNYBG billed 18.7 hours and incurred \$8,926.50 in fees in this
16 category. Included in this category are fees incurred by LNYBG preparing, finalizing, drafting,
17 analyzing, reviewing and/or revising documents and/or pleadings related to and including the
18 MORs and the SCP Fee Statements.

19 Time in this category also included reviewing and addressing the motion of the United States
20 Trustee to dismiss or convert this case, which relief was not ordered by the Court.

21 Moreover, this category includes fees incurred by LNYBG corresponding with, and
22 analyzing correspondence from, relevant parties related to: (1) payment of the quarterly fees owed
23 the United States Trustee (the "UST Quarterly Fees"); (2) issues related to the MORs; and (3) issues
24 related to the Monthly Fee Statements.

25 Finally, time in this category also included addressing issues by third parties (including Mr.
26 Smith) asserting "settlements" with the estate and Mr. Niami to obtain the Property.

27 **5. CLAIMS ADMINISTRATION AND OBJECTIONS (05).**

28 During the Covered Period, LNYBG billed 0.5 hours and incurred \$356.50 in fees in this

1 category.

2 **6. EMPLOYEE BENEFITS/PENSIONS (06).**

3 During the Covered Period, LNYBG did not bill any time in this category.

4 **7. FEE/EMPLOYMENT APPLICATIONS (07).**

5 During the Covered Period, LNYBG billed 5.8 hours and incurred \$3,787.50 in fees in this
6 category. Included in this category are fees incurred by LNYBG preparing, finalizing, drafting,
7 analyzing, reviewing and/or revising documents and/or pleadings related to and including: (1) the
8 Third Interim Fee App; (2) this Application; and (3) the Monthly Fee Statements. Moreover, this
9 category includes fees incurred by LNYBG attending the hearing on the Second Interim Fee App
10 and preparing order thereon .

11 **8. FEE/EMPLOYMENT OBJECTIONS (08).**

12 During the Covered Period, LNYBG did not bill any time in this category.

13 **9. FINANCING (09).**

14 During the Covered Period, LNYBG did not bill any time in this category.

15 **10. RELIEF FROM STAY (10).**

16 During the Covered Period, LNYBG did not bill any time in this category.

17 **11. MEETING OF CREDITORS (11).**

18 During the Covered Period, LNYBG did not bill any time in this category.

19 **12. PLAN AND DISCLOSURE STATEMENT (12).**

20 During the Covered Period, LNYBG billed 0.6 hours and incurred \$406.00 in fees.

21 **13. OTHER LITIGATION (20).**

22 The vast majority of time during the Covered Period was devoted to this category. During
23 the Covered Period During, LNYBG billed 133.4 hours and incurred \$85,425.00 in fees. After the
24 sale of the Property, the primary remaining issue is interest in the sale proceeds and the priorities
25 and interests of numerous parties asserting security interests in the sale proceeds. After extensive
26 litigation in connection with motions to dismiss and related matters, the adversary was at issue and
27 a mediation was scheduled to take place before the Hon. Sheri Bluebond. After unsuccessful
28 mediation efforts, time in this category included early meeting of counsel, initial disclosures,

1 discovery and hearings related thereto.

2 **H. DETAILED LISTING OF ALL TIME SPENT BY THE PROFESSIONAL ON THE**
3 **MATTER FOR WHICH COMPENSATION IS SOUGHT**

4 Attached hereto as **Exhibit “A”** is a detailed listing of all the time that LNYBG spent during
5 the Covered Period for which LNYBG seeks compensation including the date LNYBG rendered
6 the service, a description of the service, the amount of time spent and a designation of the person
7 who rendered the service for the period of time for the Covered Period. Also included in **Exhibit**
8 **“A”** is a breakdown of time entries into the activity codes maintained by LNYBG.

9 **I. DETAILED LISTING OF EXPENSES BY CATEGORY**

10 Attached hereto as **Exhibit “B”** is a summary listing by category and an itemization of all
11 expenses that LNYBG advanced on behalf of the Debtor during the Covered Period. These include
12 LNYBG’s expenses incurred in photocopying, making long distance telephone calls, telecopying,
13 mailing, and hiring messenger services. LNYBG generally handles regular and routine
14 photocopying in-house for which LNYBG charges clients twenty (\$.20) cents per page. While
15 LNYBG believes that this is less than LNYBG’s actual expenses incurred with regard to the
16 photocopying machines, supplies and labor associated with providing photocopying services, this
17 charge reflects the photocopying charge recommended by the OUST in the Central District of
18 California. LNYBG’s photocopy machines automatically record the number of copies made when
19 the person that is photocopying enters the client’s account number into a device attached to the
20 photocopy machine. Whenever feasible, LNYBG sends large copying projects to outside copy
21 services that charge bulk rates for photocopying. In such instances, LNYBG charges clients the
22 same amount that LNYBG pays the outside service.

23 LNYBG charges clients \$1.00 per page for sending telecopies and \$.20 per page for
24 receiving telecopies which LNYBG believes is less than LNYBG’s actual expenses incurred with
25 regard to telecopying but again is a decision by LNYBG to comply with the standards set forth by
26 the OUST in the Central District of California. All expenses that LNYBG advanced on behalf of
27 the Debtor were necessarily incurred and are properly charged as administrative expenses of the
28 Debtor’s Chapter 11 estate.

When LNYBG uses Lexis and Westlaw, the user inputs the client account number or case name for the research to be performed. Each month, LNYBG receives a Lexis and Westlaw invoice which reflects both an aggregate total of charges incurred by LNYBG for the month, as well as a break out of the specific charges incurred on behalf of each client (identified by name or client account number). The amount(s) reflected on the monthly invoice is then entered by LNYBG staff to the appropriate client account number as identified on the invoice. There is no profit or other additional charge added to the amount reflected in the Lexis and Westlaw invoice.

J. DESCRIPTION OF PROFESSIONAL EDUCATION AND EXPERIENCE

LNYBG is comprised of approximately 25 attorneys who specialize in and limit their practice to matters of insolvency, reorganization and bankruptcy law, and commercial litigation matters, and is well qualified to represent the Debtor. All attorneys comprising or associated with LNYBG are admitted to practice law in the California courts and in the United States District Court for the Central District of California. Attached hereto as **Exhibit “C”** are copies of the résumés of LNYBG’s professionals and paraprofessionals, as well as the current hourly billing rates for each of LNYBG’s professionals and paraprofessionals.

III.

STANDARD OF LAW

Prior to the enactment of the Bankruptcy Code, the rule with respect to compensation requests in the Ninth Circuit was that the Court should award attorneys’ fees in accordance with a “strict rule of economy test.” In re THC Financial Corp., 659 F.2d 951, 955 n.2 (9th Cir. 1981), cert. denied, 456 U.S. 977 (1982). This is no longer the law. The legislative history to Section 330 of the Bankruptcy Code indicates that Congress was primarily concerned with protecting the public interest in the smooth, efficient operation of the bankruptcy system by encouraging competent bankruptcy specialists to remain in the field. First National Bank of Chicago v. Committee of Creditors Holding Unsecured Claims (In re Powerline Oil Co.), 71 B.R. 767, 770 (Bankr. 9th Cir. 1986); In re Baldwin-United Corp., 79 B.R. 321, 346 (Bankr. S.D. Ohio 1987). Toward this end, Congress specifically disavowed notions of economy of administration, and provided that compensation in bankruptcy case should be comparable to what is charged in nonbankruptcy

1 matters. Id. at 346.

2 Under the lodestar approach, the Court is to determine the number of hours reasonably
3 expended in an attorney's representation of a debtor and multiply such number by a reasonable
4 hourly rate for the services performed. See Delaware Valley Citizens' Council for Clear Air, 478
5 U.S. at 565; In re Powerline Oil Co., 71 B.R. 770. A reasonable hourly rate is presumptively the
6 rate the marketplace pays for the services rendered. Missouri v. Jenkins by Agyei, 491 U.S. 274,
7 109 S.Ct. 2463, 2469 (1989); Burgess v. Klenske (In re Manoa Finance Co., Inc.) 853 F.2d 687,
8 691 (9th Cir. 1988). Recognizing that the determination of an appropriate "market rate" for the
9 services of a lawyer is inherently difficult, the Supreme Court stated:

10 "Market prices of commodities and most services are determined by supply and demand.
11 In this traditional sense there is no such thing as a prevailing market rate for the service of lawyers
12 in a particular community. The type of services rendered by lawyers, as well as their experience,
13 skill, and reputation, varies extensively -- even within a law firm. Accordingly, the hourly rates of
14 lawyers in private practice also vary widely. The fees charged often are based on the product of
15 hours devoted to the representation multiplied by the lawyer's customary rate." Blum v. Stenson,
16 465 U.S. 886, 895 n.11 (1984). The Supreme Court has stated that a reasonable attorney's fee
17 "means a fee that would have been deemed reasonable if billed to affluent plaintiffs by their own
18 attorneys." Missouri v. Jenkins by Agyei, 109 S.Ct. at 2470 (quoting City of Riverside v. Rivera,
19 477 U.S. 561, 591 (1986) (Rehnquist, J. dissenting)). Accordingly, a reasonable hourly rate is the
20 hourly amount to which attorneys in the area with comparable skill, experience and reputation
21 typically would be entitled as compensation. Blum v. Stenson, 465 U.S. at 895 n.11.

22 LNYG respectfully submits that the hourly rates for its attorneys and paraprofessionals
23 are reasonable and appropriate in the relevant community and in view of the circumstances of this
24 case, the demands that the case placed on LNYG, and LNYG's efforts and the results achieved
25 by LNYG thus far. Based on all of the foregoing, LNYG respectfully submits that its requested
26 discounted fees and expenses are reasonable and should be approved on an interim basis.

IV.

CONCLUSION

WHEREFORE, LNYG respectfully requests that the Court enter an order:

- (1) approving the Application;

(2) approving, on an interim basis, LNBYG's fees incurred during the Covered Period in the amount of \$99,061.50 and expenses incurred during the Covered Period in the amount of \$3,090.96, for total fees and expenses in the amount of \$102,152.46;

(3) authorizing the Debtor to pay LNBYG the sum of \$102,152.46, which is the total of fees and expenses incurred during the Covered Period; and

(4) granting such other and further relief as the Court deems just and proper.

Dated: November 14, 2024

LEVENE, NEALE, BENDER, YOO
& GOLUBCHIK L.L.P.

By: /s/ David B. Golubchik
DAVID B. GOLUBCHIK
TODD M. ARNOLD
JOSEPH M. ROTHBERG
Attorneys for Chapter 11 Debtor and
Debtor in Possession

1 **DECLARATION OF DAVID B. GOLUBCHIK, ESQ.**

2 I, David B. Golubchik, Esq., hereby declare as follows:

3 1. I am over 18 years of age. Except where otherwise stated, I have personal knowledge
4 of the facts set forth below and, if called to testify, I could and would testify competently thereto.

5 2. I am a partner of Levene, Neale, Bender, Yoo & Golubchik L.L.P. (“LNYG”),
6 which is serving as bankruptcy counsel to Crestlloyd, LLC, the Chapter 11 debtor and debtor in
7 possession herein (the “Debtor”).

8 3. I make this Declaration in support of LNYG’s Fourth Interim Application for
9 Approval of Fees and Reimbursement of Expenses (the “Application”) to which this Declaration is
10 attached. All capitalized terms herein which are not defined herein have the same meanings as in
11 the Application.

12 4. In the ordinary course of LNYG’s business, LNYG creates business books and
13 records (the “Books and Records”) regarding, among other things, time recorded by LNYG
14 attorneys performing particular tasks for clients and expenses incurred for particular clients.
15 LNYG’s Books and Records are made at or near the time by, or from information transmitted by,
16 a person with knowledge, in the ordinary course of the LNYG’s business and as a regular practice
17 of LNYG’s business. The amounts requested in the Application for compensation of fees and
18 reimbursement of expenses incurred are based on LNYG’s Books and Records.

19 5. I am the attorney at LNYG primarily responsible for the representation of the
20 Debtor as bankruptcy counsel during the Debtor’s Chapter 11 case. I have represented many
21 Chapter 11 debtors throughout my legal career. I have confirmed numerous Chapter 11 plans of
22 reorganization and closed the sales of numerous companies.

23 6. I participated in the drafting of the Application to which this Declaration is attached.
24 To the best of my knowledge, information and belief, all of the matters stated in the Application
25 are true and correct.

26 7. All expenses for outside services such as photocopying services, messenger and
27 express mail services, postage and research services (Lexis and Westlaw) for which LNYG
28 requests reimbursement are the actual expenses incurred by LNYG for such services, and

LNYG does not seek any additional amounts or profits with respect thereto.

8. I have reviewed the requirements of Local Bankruptcy Rule 2016-1, and I believe that the Application complies with this Rule.

I declare and verify under penalty of perjury under the laws of the United States of America
that the foregoing is true and correct.

Executed this 14th day of November 2024, at Los Angeles, California.

/s/ David B. Golubchik
DAVID B. GOLUBCHIK

EXHIBIT A

FEE APPLICATION

**Crestlloyd LLC c/o SierraConstellation
Larry Perkins, Manager
355 S. Grand Avenue, Suite 1450
Los Angeles, CA 90071**

11/13/2024

Crestlloyd LLC

DBG

OUR FILE #: 9562

PROFESSIONAL SERVICE RENDERED 11/1/2023 THROUGH 10/31/2024

TOTAL PROFESSIONAL HOURS 159.2 FEES \$99,061.50

COSTS

REPRODUCTION COSTS	2,322.20
MESSENGER SERVICE	40.22
COURT RESEARCH PACER	132.50
POSTAGE	411.21
WESTLAW RESEARCH	184.83
TOTAL COSTS	\$3,090.96

CURRENT PERIOD TOTAL PROFESSIONAL FEES AND COSTS \$102,152.46

DETAILED ACTIVITIES

Crestlloyd LLC
CASE # 9562

11/13/2024 **Page #** **1**
From Date **11/1/2023**
To Date **10/31/2024**

02 - ASSET DISPOSITION

11/14/2023 ANALYSIS OF DOCUMENTS SMITH;S OBJECTION TO E. ROARK EFFORT TO ACQUIRE PROPERTY

2661576	DBG	690.00	\$69.00	0.1
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11/16/2023 ANALYSIS OF DOCUMENTS VERIFIED BILL IN EQUITY BY EDWARD ROARK

2662445	DBG	690.00	\$69.00	0.1
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11/28/2023 ANALYSIS OF DOCUMENTS ANDRE SMITH'S OBJECTION TO EDWARD FILING RE: SALE OF PROPERTY

2665704	DBG	690.00	\$69.00	0.1
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12/13/2023 ANALYSIS OF DOCUMENTS DISTRICT COURT ORDER RE: NILE NIAMI APPEAL

2669732	DBG	690.00	\$69.00	0.1
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2/15/2024 ANALYSIS OF DOCUMENTS NOTICE OF WITHDRAWAL OF MOTION FOR DISTRIBUTION

2687319	DBG	725.00	\$72.50	0.1
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2/27/2024 ANALYSIS OF DOCUMENTS RE: SUPPLEMENTAL ANNEX RE: MOTION FOR DISTRIBUTION BY EDWARD

2688951	DBG	725.00	\$72.50	0.1
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4/8/2024 ANALYSIS OF EX PARTE FOR LEAVE TO DEPOSIT FUNDS

2702867	DBG	725.00	\$72.50	0.1
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8/19/2024 ANALYSIS OF DOCUMENTS FROM CLIENT RE: ACCOUNTING OF SALE PROCEEDS

2739806	DBG	725.00	\$72.50	0.1
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	Total		\$566.00	0.8
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04 - CASE ADMINISTRATION

11/07/2023 PREPARATION OF SCP MONTHLY FEE STATEMENT FOR SEPTEMBER 2023, SERVE AND EFILE; PPO EXHIBITS AND SERVICE LIST

2660334	LC	295.00	\$147.50	0.5
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11/10/2023 ANALYSIS OF DOCUMENTS FROM CLIENT RE: ACCOUNTING FOR ESTATE FUNDS

2660876	DBG	690.00	\$69.00	0.1
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DETAILED ACTIVITIES

Crestloyd LLC

CASE # 9562

11/13/2024 Page # 2

**From Date 11/1/2023
To Date 10/31/2024**

11/21/2023 ANALYSIS OF CORRESPONDENCE FROM CLIENT RE: MOR AND PROVIDE DOCS

2663933 DBG 690.00 \$69.00 0.1

12/6/2023 PREPARATION OF SCP MONTHLY FEE STATEMENT OCTOBER 2023, EFILE; PPO EXHIBITS AND SERVICE LISTS

2668443 LC 295.00 \$147.50 0.5

12/13/2023 ANALYSIS OF DOCUMENTS DECREE PRO CONFESSO FROM EDWARD

2669765 DBG 690.00 \$69.00 0.1

1/2/2024 PREPARATION OF NOTICE OF LNBYG'S 2024 BILLING RATES

2674654 LC 300.00 \$120.00 0.4

1/11/2024 ANALYSIS OF DOCUMENTS EDWARD'S EX PARTE MOTION FOR ATTACHMENT AND FINAL DECREE

2676390 DBG 725.00 \$72.50 0.1

1/11/2024 PREPARATION OF TWO MORS (OCTOBER AND NOVEMBER), REVISE AND EFILE

2676331 LC 300.00 \$180.00 0.6

1/11/2024 PREPARATION OF SCP MONTHLY FEE STATEMENT FOR NOVEMBER 2023, SERVE AND EFILE; PPO EXHIBITS

2676333 LC 300.00 \$150.00 0.5

1/11/2024 REVIEW, REVISE AND FINALIZE OCTOBER MOR

2676103 TMA 695.00 \$208.50 0.3

1/11/2024 REVIEW, REVISE AND FINALIZE NOVEMBER MOR

2676117 TMA 695.00 \$208.50 0.3

1/11/2024 EMAILS WITH CLIENT RE OCTOBER AND NOVEMBER MORS AND NOVEMBER SCP PROFESSIONAL FEE STATEMENT

2676118 TMA 695.00 \$139.00 0.2

1/22/2024 ANALYSIS OF CORRESPONDENCE FROM COLIN RE: INFO FOR MOR AND PROVIDE

2678212 DBG 725.00 \$72.50 0.1

DETAILED ACTIVITIES

Crestlloyd LLC
CASE # 9562

11/13/2024

From Date 11/1/2023
To Date 10/31/2024

1/22/2024 ANALYSIS OF DOCUMENTS RE: DRAFT MOR FROM COLIN

2678352	DBG	725.00	\$72.50	0.1
1/23/2024	PREPARATION OF DECEMBER MOR, REVISE, REDACT BANK STATEMENT CONFIDENTIAL INFORMATION AND EFILE			
2678846	LC	300.00	\$90.00	0.3
1/23/2024	PREPARATION OF SCP MONTHLY FEE STATEMENT (DECEMBER 2023), EFILE; PPO EXHIBITS AND SERVICE LISTS			
2678849	LC	300.00	\$150.00	0.5
1/23/2024	REVIEW, REVISE, AND FINALIZE DECEMBER 23 MOR AND EMAIL CLIENT RE SAME			
2678487	TMA	695.00	\$278.00	0.4
2/20/2024	ANALYSIS OF CORRESPONDENCE FROM CLIENT RE: MOR			
2687234	DBG	725.00	\$72.50	0.1
2/21/2024	PREPARATION OF INFO FOR CLIENT TO INCLUDE IN MOR			
2687235	DBG	725.00	\$72.50	0.1
2/22/2024	ANALYSIS OF DOCUMENTS DRAFT MOR FROM CLIENT			
2687572	DBG	725.00	\$72.50	0.1
2/26/2024	REVIEW AND REVISE JANUARY 2024 MOR AND PREPARE NOTES THEREON			
2688217	TMA	695.00	\$208.50	0.3
2/26/2024	EMAILS WITH CLIENT RE JANUARY 2024 MOR			
2688218	TMA	695.00	\$69.50	0.1
02/27/2024	PREPARATION OF JANUARY MOR, REVISE AND EFILE; REDACT BANK STATEMENT CONFIDENTIAL INFORMATION			
2689008	LC	300.00	\$90.00	0.3
2/27/2024	PREPARATION OF SCP MONTHLY FEE STATEMENT (JANUARY 2024), SERVE AND EFILE; PPO EXHIBITS			
2689010	LC	300.00	\$150.00	0.5

DETAILED ACTIVITIES

Crestlloyd LLC

CASE # 9562

11/13/2024

Page #

4

From Date

11/1/2023

To Date

10/31/2024

2/29/2024 PREPARATION OF STATUS REPORT FOR FILING AND SERVICE

2689871	RM	300.00	\$30.00	0.1
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3/6/2024 ANALYSIS OF DOCUMENTS YOGI STATUS REPORT

2690711	DBG	725.00	\$72.50	0.1
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3/20/2024 ANALYSIS OF CORRESPONDENCE COLIN RE: MOR DETAILS

2695769	DBG	725.00	\$72.50	0.1
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3/20/2024 EMAILS WITH CLIENT RE MOR

2695566	TMA	695.00	\$69.50	0.1
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3/21/2024 ANALYSIS OF CORRESPONDENCE NOREEN RE; CASE STATUS AND RESPOND

2696143	DBG	725.00	\$72.50	0.1
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3/21/2024 ANALYSIS OF DOCUMENTS FINAL MOR FROM CLIENT

2696262	DBG	725.00	\$72.50	0.1
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3/27/2024 PREPARATION OF FEBRUARY MOR, REDACT CONFIDENTIAL INFORMATION AND EFILE

2697382	LC	300.00	\$90.00	0.3
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3/27/2024 PREPARATION OF SCP MONTHLY FEE STATEMENT FOR FEBRUARY 2024, SERVE AND EFILE;
PPO EXHIBITS

2697383	LC	300.00	\$150.00	0.5
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3/27/2024 REVIEW AND FINALIZE FEBRUARY 2024 MOR

2697163	TMA	695.00	\$139.00	0.2
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3/27/2024 EMAILS WITH CLIENT RE FEBRUARY 2024 MOR

2697164	TMA	695.00	\$69.50	0.1
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3/28/2024 EMAIL WITH UST RE STATUS OF CHAPTER 11 CASE MOVING FORWARD AND EFFECT OF
LITIGATION AMONG SECURED CREDITORS RE THE SAME

2697753	TMA	695.00	\$69.50	0.1
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DETAILED ACTIVITIES

Crestlloyd LLC

CASE # 9562

11/13/2024 Page # 5

**From Date 11/1/2023
To Date 10/31/2024**

4/18/2024 ANALYSIS OF CORRESPONDENCE FROM COLIN RE: MOR DATA AND PROVIDE DOCUMENTS

2703691 DBG 725.00 \$72.50 0.1

4/22/2024 ANALYSIS OF DOCUMENTS FROM CLIENT RE: MARCH MOR

2704325 DBG 725.00 \$72.50 0.1

4/22/2024 REVIEW AND REVISE MARCH MOR AND EMAIL CLIENT RE SAME

2704489 TMA 695.00 \$208.50 0.3

4/23/2024 PREPARATION OF SCP MONTHLY FEE STATEMENT MARCH 2024, SERVE AND EFILE; PPO EXHIBITS AND SERVICE LISTS

2705138 LC 300.00 \$150.00 0.5

4/23/2024 PREPARATION OF MARCH MOR, REDACT CONFIDENTIAL INFORMATION AND EFILE

2705140 LC 300.00 \$90.00 0.3

5/10/2024 ANALYSIS OF CORRESPONDENCE COLIN RE: MOR AND PROVIDE DETAILS

2711148 DBG 725.00 \$72.50 0.1

5/21/2024 ANALYSIS OF DOCUMENTS DRAFT MOR DOCS

2713247 DBG 725.00 \$72.50 0.1

5/22/2024 ANALYSIS OF DOCUMENTS FROM S. RUSSO RE: UPDATED MOR

2713567 DBG 725.00 \$72.50 0.1

6/3/2024 ANALYSIS OF DOCUMENTS MONTHLY OPERATING REPORT

2716398 DBG 725.00 \$72.50 0.1

6/3/2024 PREPARATION OF SCP MONTHLY FEE STATEMENT FOR APRIL 2024, SERVE AND EFILE; PPO EXHIBITS AND SERVICE LISTS

2716605 LC 300.00 \$120.00 0.4

6/3/2024 PREPARATION OF APRIL MOR, REDACT BANK STATEMENT CONFIDENTIAL INFORMATION AND EFILE

2716606 LC 300.00 \$90.00 0.3

DETAILED ACTIVITIES

Crestlloyd LLC
CASE # 9562

11/13/2024 **Page #** **6**
From Date **11/1/2023**
To Date **10/31/2024**

6/3/2024 REVIEW AND FINALIZE APRIL 2024 MOR AND EMAIL WITH CLIENT RE SAME

2716096 TMA 695.00 \$139.00 0.2

6/21/2024 ANALYSIS OF CORRESPONDENCE COLIN RE: MOR INFORMATION

2723256 DBG 725.00 \$72.50 0.1

6/21/2024 ANALYSIS OF DOCUMENTS FROM CLIENT RE: MOR DOCS FOR FILING

2723448 DBG 725.00 \$72.50 0.1

6/25/2024 ANALYSIS OF DOCUMENTS FROM PERKINS RE: MOR DOCUMENTS

2723765 DBG 725.00 \$72.50 0.1

6/26/2024 PREPARATION OF MAY MOR, REDACT CONFIDENTIAL INFORMATION ON BANK STATEMENT AND EFILE

2724920 LC 300.00 \$90.00 0.3

6/26/2024 REVIEW AND FINALIZE MAY MOR AND EMAILS WITH CLIENT RE SAME

2724122 TMA 695.00 \$208.50 0.3

6/28/2024 ANALYSIS OF DOCUMENTS UST'S NOTICE OF MOTION TO DISMISS OR CONVERT

2727810 DBG 725.00 \$72.50 0.1

07/02/2024 PREPARATION OF SCP MONTHLY FEE STATEMENT FOR MAY 2024, SERVE AND EFILE; PPO EXHIBITS

2725334 LC 300.00 \$180.00 0.6

7/4/2024 PREPARATION OF CORRESPONDENCE NOREEN (UST) RE: NOTICE RE: MOTION TO DISMISS OR CONVERT

2727811 DBG 725.00 \$72.50 0.1

7/11/2024 EMAILS WITH UST RE "MOTION TO DISMISS" DOCKET ENTRY

2729467 TMA 695.00 \$139.00 0.2

7/22/2024 ANALYSIS OF CORRESPONDENCE COLIN RE: INFO FOR MOR AND PROVIDE

2731575 DBG 725.00 \$72.50 0.1

DETAILED ACTIVITIES

**Crestlloyd LLC
CASE # 9562**

11/13/2024 **Page #** **7**
From Date **11/1/2023**
To Date **10/31/2024**

7/22/2024 PREPARATION OF SCP MONTHLY FEE STATEMENT FOR JUNE 2024, SERVE AND EFILE; PPO EXHIBITS

2732295	LC	300.00	\$150.00	0.5
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7/22/2024 REVIEW AND REVISE JUNE MOR

2731642	TMA	695.00	\$139.00	0.2
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7/22/2024 EMAILS WITH CLIENT RE JUNE MOR

2731643	TMA	695.00	\$69.50	0.1
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7/23/2024 PREPARATION OF JUNE MOR, REVISE AND EFILE

2732299	LC	300.00	\$60.00	0.2
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8/22/2024 ANALYSIS OF DOCUMENTS DRAFT MOR AND PROVIDE COMMENT

2740794	DBG	725.00	\$72.50	0.1
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8/23/2024 ANALYSIS OF DOCUMENTS FROM CLIENT RE: FINALIZED MOR

2741867	DBG	725.00	\$72.50	0.1
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8/23/2024 REVIEW AND REVISE JULY MOR AND FINALIZE FOR FILING

2740998	TMA	695.00	\$278.00	0.4
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8/23/2024 EMAILS WITH CLIENT RE JULY MOR

2740999	TMA	695.00	\$69.50	0.1
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8/23/2024 PREPARE JULY FEE STATEMENT FOR SIERRA CONSTELLATION PARTNERS

2741000	TMA	695.00	\$208.50	0.3
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8/23/2024 EMAIL WITH CLIENT RE JULY FEE STATEMENT FOR SIERRA CONSTELLATION PARTNERS

2741050	TMA	695.00	\$69.50	0.1
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08/26/2024 PREPARATION OF SCP MONTHLY FEE STATEMENT FOR JULY 2024, SERVE AND EFILE; PPO EXHIBITS

2742106	LC	300.00	\$150.00	0.5
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DETAILED ACTIVITIES

Crestlloyd LLC

CASE # 9562

11/13/2024 Page # 8

**From Date 11/1/2023
To Date 10/31/2024**

8/26/2024 PREPARATION OF JULY MOR, REDACT CONFIDENTIAL INFORMATION ON BANK STATEMENTS AND EFILE

2742117	LC	300.00	\$90.00	0.3
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9/24/2024 ANALYSIS OF CORRESPONDENCE COLIN RE: MOR INFORMATION AND PROVIDE DETAILS

2749151	DBG	725.00	\$72.50	0.1
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9/24/2024 ANALYSIS OF DOCUMENTS DRAFT MOR FOR AUGUST 2024

2749153	DBG	725.00	\$72.50	0.1
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9/26/2024 PREPARATION OF SCP MONTHLY FEE STATEMENT FOR AUGUST 2024, SERVE AND EFILE; PPO EXHIBITS AND SERVICE LISTS

2750055	LC	300.00	\$150.00	0.5
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9/26/2024 PREPARATION OF AUGUST MOR, REDACT BANK STATEMENT CONFIDENTIAL INFORMATION AND EFILE

2750056	LC	300.00	\$90.00	0.3
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9/26/2024 REVIEW, REVISE, AND FINALIZE AUGUST 2024 MOR

2749636	TMA	695.00	\$208.50	0.3
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9/26/2024 EMAILS WITH CLIENT RE AUGUST 2024 MOR

2749752	TMA	695.00	\$69.50	0.1
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10/17/2024 PREPARATION OF INFO FOR COLIN RE: MOR

2756113	DBG	725.00	\$72.50	0.1
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10/23/2024 ANALYSIS OF DOCUMENTS STEPHANIE RE: MOR

2757421	DBG	725.00	\$72.50	0.1
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10/23/2024 PREPARATION OF SCP MONTHLY FEE STATEMENT FOR SEPTEMBER 2024, SERVE AND EFILE; PPO EXHIBITS AND SERVICE LIST

2758395	LC	300.00	\$150.00	0.5
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10/23/2024 PREPARATION OF SEPTEMBER MOR, REDACT BANK STATEMENT'S CONFIDENTIAL INFORMATION AND EFILE

2758396	LC	300.00	\$90.00	0.3
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DETAILED ACTIVITIES

Crestlloyd LLC
CASE # 9562

11/13/2024 Page # 9
From Date 11/1/2023
To Date 10/31/2024

10/23/2024 REVIEW, REVISE AND FINALIZE SEPTEMBER MOR AND EMAILS WITH CLIENT RE SAME

2757372	TMA	695.00	\$278.00	0.4
		Total	\$8,926.50	18.7

05 - CLAIMS ADMIN. AND OBJECTIONS

4/25/2024 ANALYSIS OF CORRESPONDENCE J. LUCAS RE: UNSECURED CLAIMS

2705419	DBG	725.00	\$72.50	0.1
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4/29/2024 ANALYSIS OF DOCUMENTS UNSECURED CREDITOR DETAILS

2706099	DBG	725.00	\$72.50	0.1
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6/18/2024 REVIEW MADE BY TSI POC AND CALL AND EMAIL WITH MADE BY TSI RE STATUS OF CASE AND CLAIM

2722387	TMA	695.00	\$139.00	0.2
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7/30/2024 ANALYSIS OF CORRESPONDENCE M. LIEBERMAN RE: ITALIAN LUXURY CLAIM

2733553	DBG	725.00	\$72.50	0.1
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Total		\$356.50	0.5
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07 - FEE / EMPLOYMENT APPLICATIONS

11/3/2023 PREPARATION OF 3RD INTERIM FEE APP

2658701	DBG	690.00	\$345.00	0.5
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11/6/2023 PREPARATION OF NOTICE RE: 3RD INTERIM FEE APP

2658702	DBG	690.00	\$138.00	0.2
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11/6/2023 PREPARATION OF LNBYG 3RD INTERIM FEE APP

2658703	DBG	690.00	\$828.00	1.2
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11/6/2023 DRAFT SIERRA CONSTELLATION STPEMBER FEE STATEMENT

2659027	TMA	650.00	\$130.00	0.2
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DETAILED ACTIVITIES

Crestlloyd LLC

CASE # 9562

11/13/2024 Page # 10

**From Date 11/1/2023
To Date 10/31/2024**

11/7/2023 ANALYSIS OF CORRESPONDENCE FROM UST RE: LEDES DATA FOR FEE APP

2659809	DBG	690.00	\$69.00	0.1
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11/14/2023 PREPARATION OF DOCS FOR UST RE: LEDES INFORMATION FOR FEE APPLICATION

2661577	DBG	690.00	\$69.00	0.1
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11/16/2023 ANALYSIS OF DOCUMENTS INFERNO'S RESERVATION OF RIGHTS RE: FEE APP

2662470	DBG	690.00	\$69.00	0.1
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11/21/2023 ANALYSIS OF CORRESPONDENCE FROM D. LAW RE: FEE APP AND PROVIDE INFORMATION

2664192	DBG	690.00	\$69.00	0.1
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11/30/2023 PREPARATION OF ORDER GRANTING THIRD INTERIM APPLICATION OF LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P. FOR APPROVAL OF FEES AND REIMBURSEMENT OF EXPENSES

2665996	JK	295.00	\$59.00	0.2
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11/30/2023 ANALYSIS OF COURT'S REJECTION NOTICE, PPO FORM ORDER FOR LNYBG FEE APP AND UPLOAD

2666353	LC	295.00	\$88.50	0.3
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11/30/2023 DRAFT ORDER ON LNYBG'S THIRD INTERIM FEE APPLICATION

2665972	TMA	650.00	\$260.00	0.4
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12/1/2023 ANALYSIS OF ENTERED ORDER RE: FEE APP

2667098	DBG	690.00	\$69.00	0.1
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12/1/2023 ANALYSIS OF ORDER ON THIRD INTERIM FEE APPLICATION OF LNYBG

2666074	TMA	650.00	\$65.00	0.1
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1/11/2024 DRAFT NOVEMBER PROFESSIONAL FEE STATEMENT FOR SIERRA CONSTELLATION

2676191	TMA	695.00	\$139.00	0.2
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1/23/2024 PREPARE DECEMBER 23 PROFESSIONAL FEE SUBMISSION FOR SIERRA CONSTELLATION AND EMAIL RE SAME

2678486	TMA	695.00	\$139.00	0.2
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DETAILED ACTIVITIES

Crestlloyd LLC
CASE # 9562

11/13/2024 **Page #** **11**

From Date **11/1/2023**
To Date **10/31/2024**

3/27/2024 DRAFT FEBRUARY 2024 FEE STATEMENT SUBMISSION FOR SIERRA CONSTELLATION

2697245	TMA	695.00	\$139.00	0.2
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3/27/2024 EMAILS WITH CLIENT RE FEBRUARY 2024 FEE STATEMENT SUBMISSION FOR SIERRA CONSTELLATION

2697246	TMA	695.00	\$69.50	0.1
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4/22/2024 REVIEW AND REVISE MARCH FEE STATEMENT FOR SIERRA CONSTELLATION AND EMAIL CLIENT RE SAME

2704488	TMA	695.00	\$139.00	0.2
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6/3/2024 DRAFT SIERRA CONSTELLATION APRIL 2024 FEE STATEMENT AND EMAIL WITH CLIENT RE SAME

2716095	TMA	695.00	\$139.00	0.2
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7/1/2024 DRAFT MAY PROFESSIONAL FEE STATEMENT FOR SIERRA CONSTELLATION PARTNERS

2724917	TMA	695.00	\$139.00	0.2
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7/22/2024 DRAFT JUNE PROFESSIONAL FEE STATEMENT FOR SIERRA CONSTELLATION

2731698	TMA	695.00	\$139.00	0.2
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7/22/2024 EMAIL WITH CLIENT RE JUNE PROFESSIONAL FEE STATEMENT FOR SIERRA CONSTELLATION

2731699	TMA	695.00	\$69.50	0.1
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9/26/2024 PREPARE AUGUST 2024 MONTHLY FEE STATEMENT FOR SIERRA CONSTELLATION

2749504	TMA	695.00	\$139.00	0.2
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9/26/2024 EMAIL WITH CLIENT RE AUGUST 2024 MONTHLY FEE STATEMENT FOR SIERRA CONSTELLATION

2749505	TMA	695.00	\$69.50	0.1
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10/23/2024 DRAFT SUBMISSION OF SEPTEMBER 2024 FEE STATEMENT FOR SIERRA CONSTELLATION AND EMAILS RE SAME WITH CLIENT

2757373	TMA	695.00	\$208.50	0.3
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Total	\$3,787.50	5.8
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DETAILED ACTIVITIES

Crestlloyd LLC
CASE # 9562

11/13/2024 **Page #** **12**
From Date **11/1/2023**
To Date **10/31/2024**

20 - OTHER LITIGATION

11/3/2023 ANALYSIS OF CORRESPONDENCE FROM S. BLUEBOND RE: MEDIATION

2658795 DBG 690.00 \$69.00 0.1

11/6/2023 FOLLOW UP COMMS W/ J. MOE RE: MEDIATION BRIEF SCHEDULE AND STIP FOR A PROTECTIVE ORDER RE: DOCUMENT PRODUCTION.

2658893 JMR 650.00 \$195.00 0.3

11/6/2023 STRATEGIZE RE: CONTENTS OF MEDIATION BRIEF TO JUDGE BLUEBOND; FURTHER REVIEW OF PLEADINGS IN CONNECTION WITH SAME.

2659543 JMR 650.00 \$845.00 1.3

11/6/2023 PREPARATION OF NOTICE OF FEE APPLICATION AND FEE APPLICATION FOR FILING.

2664809 RM 295.00 \$88.50 0.3

11/7/2023 MULTIPLE COMMS W/ J. MOE RE: UPCOMING MEDIATION, STIPULATION FOR A PROTECTIVE ORDER, AND PRODUCTION OF DOCUMENTS.

2660068 JMR 650.00 \$260.00 0.4

11/7/2023 INITIAL REVIEW OF DOCS PRODUCED BY YOGI UNDER CONFIDENTIALITY STIPULATION IN PREPARATION FOR DRAFTING MEDIATION BRIEF.

2660224 JMR 650.00 \$520.00 0.8

11/8/2023 ANALYSIS OF DOCUMENTS RE: INFERNOS RESPONSES TO HANKEY'S DOCUMENT PRODUCTION REQUEST

2660280 DBG 690.00 \$69.00 0.1

11/8/2023 CONTINUE DRAFT AND PREPARE MEDIATION BRIEF OF CRESTLLOYD.

2660528 JMR 650.00 \$910.00 1.4

11/9/2023 ANALYSIS OF CORRESPONDENCE RE: ESTATE FUND STATUS FOR MEDIATION

2660618 DBG 690.00 \$69.00 0.1

11/9/2023 DISCUSSION WITH CLIENT RE: MEDIATION ISSUES TO ADDRESS

2660771 DBG 690.00 \$138.00 0.2

11/9/2023 CONTINUE DRAFT AND PREPARE MEDIATION BRIEF.

2660567 JMR 650.00 \$1,560.00 2.4

DETAILED ACTIVITIES

Crestlloyd LLC
CASE # 9562

11/13/2024 **Page #** **13**

From Date **11/1/2023**
To Date **10/31/2024**

11/9/2023 COMMS W/ J. MOE RE: BALANCE OF DEBTOR'S ACCOUNTS AT PRESENT.

2660734 JMR 650.00 \$130.00 0.2

11/9/2023 STRATEGIZE W/ CLIENTS RE: CONTENTS OF MEDIATION BRIEF AND OTHER ISSUES TO DETERMINE AFTER CREDITOR FIGHT IS COMPLETE.

2660764 JMR 650.00 \$130.00 0.2

11/10/2023 PREPARATION OF MEDIATION BRIEF FOR BLUEBOND

2660929 DBG 690.00 \$552.00 0.8

11/10/2023 CONTINUE DRAFT AND REVISE MEDIATION BRIEF; STRATEGIZE W/ DBG RE: POSITIONS IN SAME.

2660921 JMR 650.00 \$910.00 1.4

11/13/2023 REVIEW, REVISE, FINALIZE, AND COORDINATE SUBMISSION OF DEBTOR'S CONFIDENTIAL MEDIATION BRIEF.

2661188 JMR 650.00 \$520.00 0.8

11/16/2023 ANALYSIS OF CORRESPONDENCE FROM T. GEHER RE: SALE PROCEEDS AND MEDIATION

2662444 DBG 690.00 \$69.00 0.1

11/16/2023 COMMS W/ COUNSEL FOR HANKEY, T. GEHER RE: FUND HELD BY ESTATE / MEDIATION.

2662350 JMR 650.00 \$65.00 0.1

11/17/2023 FOLLOW UP COMMS W/ T. GEHER AND R. COY RE: MEDIATION LOGISTICS.

2662879 JMR 650.00 \$130.00 0.2

11/20/2023 PREPARATION OF DOCS FOR MEDIATION WITH INFERNO

2663376 DBG 690.00 \$345.00 0.5

11/20/2023 PREPARATION OF CORRESPONDENCE TO JOHN MOE RE: MEDIATION

2663833 DBG 690.00 \$69.00 0.1

11/20/2023 ANALYSIS OF DOCUMENTS FROM COLIN RE: MEDIATION CONFIDENTIALITY

2663843 DBG 690.00 \$69.00 0.1

DETAILED ACTIVITIES

Crestlloyd LLC

CASE # 9562

11/13/2024

Page #

14

From Date

11/1/2023

To Date

10/31/2024

11/21/2023 ATTEND MEDIATION RE: DISPUTE WITH SECURED CREDITORS

2664191 DBG 690.00 \$5,727.00 8.3

11/21/2023 DEBRIEF RE: RESULTS OF CRESTLLOYD MEDIATION PART ONE; REVIEW OF DEADLINES FOR NEW PORTION OF SAME.

2664218 JMR 650.00 \$130.00 0.2

11/22/2023 ANALYSIS OF CORRESPONDENCE FROM CLIENT RE: FORENSIC ACCOUNTING FROM TED LANES

2664268 DBG 690.00 \$69.00 0.1

11/26/2023 REVIEW OF COMMS FROM P. SORRELL RE: UNAVAILABILITY TO PROCEED TO FUTHER MEDIATION.

2665168 JMR 650.00 \$65.00 0.1

11/27/2023 ANALYSIS OF CORRESPONDENCE FROM J. MOE RE: EXCHANGE OF BRIEFS FOR FUTURE MEDIATION

2665274 DBG 690.00 \$69.00 0.1

11/27/2023 PREPARATION OF STATUS REPORT IN ADVERSARY PROCEEDING.

2667124 RMC 450.00 \$450.00 1.0

11/28/2023 REVIEW AND REVISE STATUS UPDATE TO COURT RE: DEFAULTING PARTIES; COMMS W/ R. CARRASCO RE: SAME.

2665176 JMR 650.00 \$130.00 0.2

11/28/2023 PREPARATION OF FINAL STATUS REPORT IN ADVERSARY PROCEEDING.

2667148 RMC 450.00 \$90.00 0.2

11/29/2023 ANALYSIS OF CORRESPONDENCE FROM JOHN MOE RE: MEDIATION BRIEF

2665865 DBG 690.00 \$69.00 0.1

11/30/2023 PREPARATION OF CORRESPONDENCE TO CLIENT RE: INVESTIGATION OF FORENSIC FILES FOR MEDIATION

2667096 DBG 690.00 \$69.00 0.1

11/30/2023 ANALYSIS OF CORRESPONDENCE FROM JOHN MOE RE: EXCHANGE OF MEDIATION BRIEFS

2667358 DBG 690.00 \$69.00 0.1

DETAILED ACTIVITIES

Crestlloyd LLC

CASE # 9562

11/13/2024 Page # 15

**From Date 11/1/2023
To Date 10/31/2024**

11/30/2023 INITIAL REVIEW AND ANALYSIS OF YOGI'S REDACTED MEDIATION BRIEF.

2666397 JMR 650.00 \$390.00 0.6

12/1/2023 ANALYSIS OF MEDIATION BRIEFS OF OTHER PARTIES TO LITIGATION

2667099 DBG 690.00 \$276.00 0.4

12/1/2023 REVIEW AND ANALYSIS OF REDACTED MEDIATION BRIEF BY INFERNO.

2666488 JMR 650.00 \$390.00 0.6

12/1/2023 PREPARE / CIRCULATE REDACTED MEDIATION BRIEF.

2666498 JMR 650.00 \$195.00 0.3

12/6/2023 PREPARE FOR AND VIRTUALLY ATTEND STATUS CONFERENCE HEARING.

2667925 JMR 650.00 \$260.00 0.4

12/6/2023 REVIEW OF COURT'S ORDERS CONT. STATUS CONFERENCES / UPDATE TO DBG RE: SAME / CALENDARING.

2668085 JMR 650.00 \$65.00 0.1

12/8/2023 COORDINATE RE: SCHEDULING SESSION 2 OF MEDIATION.

2668641 JMR 650.00 \$130.00 0.2

12/29/2023 DISCUSSIONS WITH BAMBI RE: NIAMI APPEAL

2674285 DBG 690.00 \$138.00 0.2

12/29/2023 CONFERENCE CALL WITH NINO RE: NIAMI APPEAL RE: SALE AND CONCIERGE

2674287 DBG 690.00 \$207.00 0.3

12/29/2023 ANALYSIS OF DOCUMENTS FROM JOHN MOE RE: CLAIMS VS. YOGI AND DISCUSS

2674765 DBG 690.00 \$138.00 0.2

12/29/2023 COMMS W/ COUNSEL FOR YOGI, J. MOE, RE: REQUEST FOR FURTHER INFORMATION.

2673670 JMR 650.00 \$130.00 0.2

DETAILED ACTIVITIES

Crestlloyd LLC

CASE # 9562

11/13/2024

Page #

16

From Date

11/1/2023

To Date

10/31/2024

1/2/2024 ANALYSIS OF ORDER AFFIRMING SALE ORDER AND DENYING APPEAL

2674286	DBG	725.00	\$72.50	0.1
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1/2/2024 PHONE CALL TO J. MOE RE: ADDITIONAL DETAILS NEEDED AT NEXT SESSION OF MEDIATION; EMAIL TO SAME.

2673683	JMR	695.00	\$139.00	0.2
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1/3/2024 ANALYSIS OF DOCUMENTS RE: ACCOUNTING FOR YOGI LENDING AND USE OF FUNDS

2674288	DBG	725.00	\$217.50	0.3
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1/3/2024 PHONE CALL FROM JOHN MOE RE: CONFIRMATION OF DISTRIBUTION OF CRESTLLOYD ESCROW FUNDS.

2673843	JMR	695.00	\$139.00	0.2
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1/3/2024 EMAIL TO C. MORAN RE: ISSUES PERTAINING TO MEMO FROM JOHN MOE RE: DISTRIBUTION OF HELD ESCROW FUNDS.

2673845	JMR	695.00	\$69.50	0.1
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1/3/2024 REAL ESTATE COMMISSION APPEAL - REVIEW ORDER DENYING APPEAL/AFFIRMING BK FEE ORDERS

2673961	TMA	695.00	\$139.00	0.2
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1/18/2024 COMMS W/ J. MOE RE: WITHDRAWAL FROM YOGI REPRESETNATION / ATTORNEY SUB / FURTHER INFORMATION REQUESTED FOR MEDIATION.

2677739	JMR	695.00	\$139.00	0.2
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1/22/2024 ANALYSIS OF CORRESPONDENCE FROM J. LUCAS RE: YOGI CLAIMS AND RESPOND

2678213	DBG	725.00	\$72.50	0.1
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1/22/2024 CONFERENCE CALL WITH LUCAS RE: LITIGATION AND YOGI CLAIMS

2678224	DBG	725.00	\$217.50	0.3
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1/22/2024 CALL W/ J. LUCAS RE: INFROMATION SOUGHT BY YOGI IN ADVANCE OF MEDIATION.

2678217	JMR	695.00	\$139.00	0.2
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1/22/2024 REVIEW MEMO FROM JOHN MOE RE; ADDITIONAL DOCUMENTS; EMAIL TO SAIL ESCROW RE: AUTHORIZATION TO RELEASE ADDITIONAL DOCUMENTATION TO J. LUCAS (NEW COUNSEL FOR YOGI).

2678218	JMR	695.00	\$208.50	0.3
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DETAILED ACTIVITIES

Crestlloyd LLC

CASE # 9562

11/13/2024 Page # 17

**From Date 11/1/2023
To Date 10/31/2024**

1/22/2024 FOLLOW UP COMMS W/ ESCROW AGENT AT SAIL ESCROW RE: RELEASE OF FUNDS.

2678307	JMR	695.00	\$69.50	0.1
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1/25/2024 ANALYSIS OF DOCUMENTS RE: YOGI FUNDING AND PAYMENT OF EXPENSES

2679610	DBG	725.00	\$145.00	0.2
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1/25/2024 REVIEW WIRE VERIFICATIONS PRODUCED BY SAIL NORTH HOLLYWOOD ESCROW AND COMMS FROM SAME.

2679561	JMR	695.00	\$139.00	0.2
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1/26/2024 ANALYSIS OF CORRESPONDENCE FROM J. LUCAS RE: ESCROW RECORDS

2679871	DBG	725.00	\$72.50	0.1
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1/26/2024 COMMS W/ J. LUCAS RE: CONFIRMATION OF WIRE TRANSFERS IN ESCROW AND COPY OF REDACTED BRIEF.

2679865	JMR	695.00	\$208.50	0.3
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1/31/2024 REVIEW OF DOCKET RE: NEXT STATUS CONFERENCE / ORDER GRANTING SUBSTITUTION FOR J. MOE.

2680701	JMR	695.00	\$139.00	0.2
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2/2/2024 ANALYSIS OF DOCUMENTS RE: ACCOUNTING FOR HANKEY CLAIM

2681586	DBG	725.00	\$72.50	0.1
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2/5/2024 ANALYSIS OF DOCUMENTS INFERNO ACCOUNTING FOR MEDIATION

2682353	DBG	725.00	\$72.50	0.1
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2/5/2024 PREPARATION OF DEBTOR DOCUMENTS FOR CONTINUED MEDIATION

2682354	DBG	725.00	\$362.50	0.5
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2/5/2024 REVIEW OF BINDER FROM NEW COUNSEL FOR YOGI; STRATEGIZE RE: UPCOMING PART 2 OF MEDIATION.

2682154	JMR	695.00	\$208.50	0.3
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2/7/2024 ANALYSIS OF DOCUMENTS FROM J. LUCAS RE: YOGI CLAIM ANALYSIS AND ACCOUNTING

2689426	DBG	725.00	\$72.50	0.1
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DETAILED ACTIVITIES

Crestlloyd LLC

CASE # 9562

11/13/2024

Page #

18

From Date

11/1/2023

To Date

10/31/2024

2/8/2024 SCAN DOCUMENTS IN EXHIBIT BINDER FROM YOGI

2689826	RM	300.00	\$150.00	0.5
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2/15/2024 ANALYSIS OF CORRESPONDENCE FROM JUDGE BLUEBOND RE: RESCHEDULING MEDIATION

2685200	DBG	725.00	\$72.50	0.1
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2/15/2024 REVIEW AND ANALYSIS OF COMMUNICATIONS FROM JUDGE BLUEBOND RE: LIMITED MEDIATION BETWEEN YOGI AND HANKEY; STRATEGIZE RE: NEXT STEPS.

2685205	JMR	695.00	\$139.00	0.2
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2/16/2024 ANALYSIS OF CORRESPONDENCE RE: RESCHEDULING MEDIATION WITH BLUEBOND

2687281	DBG	725.00	\$72.50	0.1
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2/16/2024 ANALYSIS OF CORRESPONDENCE FROM JOHN LUCAS RE: MEDIATION BRIEF

2687282	DBG	725.00	\$72.50	0.1
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2/16/2024 COMMS W/ J. BLUEBOND RE: RE-SETTING "PHASE 2" OF MEDIATION.

2685408	JMR	695.00	\$69.50	0.1
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2/23/2024 ANALYSIS OF CORRESPONDENCE FROM BLUEBOND RE: MEDIATION

2688072	DBG	725.00	\$72.50	0.1
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2/23/2024 REVIEW OF COMMS FROM J. BLUEBOND RE: POTENTIAL NEW MEDIATION DATES.

2688023	JMR	695.00	\$69.50	0.1
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2/27/2024 PREPARATION OF STATUS REPORT RE: ADVERSARY

2688943	DBG	725.00	\$72.50	0.1
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2/27/2024 PREPARE STATUS UPDATE TO COURT IN ADVANCE OF STATUS CONFERENCE HEARING.

2688668	JMR	695.00	\$347.50	0.5
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2/27/2024 ANALYSIS OF STATUS REPORT RE ADVERSARY PROCEEDING.

2688776	RMC	495.00	\$49.50	0.1
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DETAILED ACTIVITIES

**Crestlloyd LLC
CASE # 9562**

11/13/2024 Page # 19

**From Date 11/1/2023
To Date 10/31/2024**

2/28/2024 ANALYSIS OF CORRESPONDENCE FROM H. STEINBERG RE: CONTINUING STATUS CONFERENCE PENDING MEDIATION

2688932	DBG	725.00	\$72.50	0.1
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2/29/2024 ANALYSIS OF DOCUMENTS FROM INFERNO RE: STATUS REPORT

2689309	DBG	725.00	\$72.50	0.1
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2/29/2024 REVIEW, REVISE, FINALIZE, AND COORDINATE FILING OF STATUS UPDATE TO COURT.

2689273	JMR	695.00	\$139.00	0.2
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2/29/2024 REVIEW AND ANALYSIS OF STATUS CONFERENCE STATEMENT BY INFERNO.

2689403	JMR	695.00	\$139.00	0.2
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3/6/2024 REVIEW OF STATUS CONFERENCE STATEMENTS FILED BY ALL OTHER ADVERSARY PARTIES / PREPARE FOR STATUS CONFERENCE HEARING.

2691141	JMR	695.00	\$208.50	0.3
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3/7/2024 TELEPHONICALLY ATTEND STATUS CONFERENCE HEARING BEFORE JUDGE SALTZMAN.

2691062	JMR	695.00	\$1,251.00	1.8
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3/8/2024 REVIEW COURTS ORDERS AFTER HEARING / CONTINUING STATUS CONFERENCE.

2691716	JMR	695.00	\$69.50	0.1
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3/20/2024 ANALYSIS OF CORRESPONDENCE FROM BLUEBOND RE: MEDIATION UPDATE

2695794	DBG	725.00	\$72.50	0.1
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3/20/2024 REVIEW AND ANALYSIS OF COMMUNICATIONS FROM S. BLUEBOND RE: MEDIATION.

2695834	JMR	695.00	\$69.50	0.1
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3/20/2024 REVIEW OF OPPOSITION TO TRUSTEE'S MOTION TO EXTEND / COMMS W/ COUNSEL FOR ROCKETS RE: JUDGE ZIVE'S CHAMBERS RE: MEDIATION; STRATEGIZE W/ CLIENT RE: SAME.

2695858	JMR	695.00	\$278.00	0.4
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3/20/2024 ACTION RE SECURED CLAIMS - EMAILS RE STATUS OF CASE AND MEDIATION

2695812	TMA	695.00	\$69.50	0.1
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DETAILED ACTIVITIES

Crestloyd LLC

CASE # 9562

11/13/2024

Page #

20

From Date

11/1/2023

To Date

10/31/2024

3/21/2024 ANALYSIS OF CORRESPONDENCE CLIENT RE: PENDING LITIGATION

2696253	DBG	725.00	\$72.50	0.1
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3/25/2024 COMMS W/ COURTROOM ASSISTANT RE: RESCHEDULING STATUS CONFERENCE.

2696691	JMR	695.00	\$69.50	0.1
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4/15/2024 MULTIPLE COMMS W/ COUNSEL FOR YOGI, JOHN LUCAS RE: MEDIATION; ANALYSIS RE: BALANCE REMAINING.

2702789	JMR	695.00	\$208.50	0.3
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4/15/2024 REVIEW RE: REQUEST FOR REPORT ONM CASH ON HAND FOR DEBTOR / BALANCE LEFTOVER AFTER SALE OF AEROLE PROPERTY PER INQUIRY FROM J. LUCAS.

2702880	JMR	695.00	\$139.00	0.2
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4/16/2024 ANALYSIS OF CORRESPONDENCE JUDGE BLUEBOND RE: MEDIATION

2703857	DBG	725.00	\$72.50	0.1
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4/16/2024 ANALYSIS OF DOCUMENTS CLIENT RE: FINANCIAL ACCOUNTING RE: SALE PROCEEDS

2703859	DBG	725.00	\$72.50	0.1
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4/16/2024 REVIEW COMMS FROM J. BLUEBOND AND OTHER PARTIES TO ADV. PROCEEDING RE: UPCOMING MEDIATION AND LOGISTICAL ISSUES CONCERNING SAME; STRATEGIZE W/ DBG RE: SAME.

2703216	JMR	695.00	\$208.50	0.3
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4/16/2024 DRAFT EMAIL TO COUNSEL FOR YOGI, J. LUCAS, RE: DEBTOR'S SALE PROCEEDS AND CAST ON HAND.

2703218	JMR	695.00	\$139.00	0.2
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4/17/2024 ANALYSIS OF CORRESPONDENCE RE: CONTINUED MEDIATION

2703815	DBG	725.00	\$72.50	0.1
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4/17/2024 FURTHER COORDINATE RE: MEDIATION PART 2.

2703402	JMR	695.00	\$139.00	0.2
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4/18/2024 PREPARATION OF CORRESPONDENCE CLIENT RE: MEDIATION AND SETTLEMENT AUTHORITY

2703863	DBG	725.00	\$72.50	0.1
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DETAILED ACTIVITIES

Crestlloyd LLC
CASE # 9562

11/13/2024

Page #

21

From Date 11/1/2023
To Date 10/31/2024

4/19/2024 CONFERENCE CALL WITH RE: MEDIATION WITH BLUEBOND

2704338	DBG	725.00	\$145.00	0.2
4/25/2024	COMMS W/ J. LUCAS, COUNSEL FOR YOGI, RE: INFORMATION RELATED TO AMOUNT OF UNSECURED CLAIMS ON DEBTOR..			
2705594	JMR	695.00	\$139.00	0.2
4/29/2024	FOLLOW UP RE: ROUGH ESTIMATES OF CLAIMS PER REQUEST BY COUNSEL FOR YOGI; REVIEW OF CLAIMS ANALYSIS; DRAFT EMAIL TO OPPOSING COUNSEL J. LUCAS RE: SAME IN CONNECTION WITH UPCOMING MEDIATION.			
2705957	JMR	695.00	\$347.50	0.5
5/1/2024	ANALYSIS OF CORRESPONDENCE BLUEBOND RE: MEDIATION			
2707198	DBG	725.00	\$72.50	0.1
5/1/2024	ANALYSIS OF CORRESPONDENCE LUCAS RE: RESCHEDULING HEARING PENDING MEDIATION			
2707199	DBG	725.00	\$72.50	0.1
5/1/2024	REVIEW OF COMMS FROM J. BLUEBOND AND J. LUCAS RE: COORDINATING MEDIATION.			
2707002	JMR	695.00	\$69.50	0.1
5/1/2024	COORDINATE W/ CLIENTS RE: GLOBAL MEDIATION AND ATTENDANCE AT SAME.			
2707061	JMR	695.00	\$69.50	0.1
5/1/2024	REVIEW OF DRAFT STIP TO CONTINUE STATUS CONFERENCE PREPARED BY J. LUCAS; COMMS W/ COUNSEL RE: SAME.			
2707090	JMR	695.00	\$139.00	0.2
5/2/2024	ANALYSIS OF COURT ORDER CONTINUING HEARING PENDING MEDIATION			
2707722	DBG	725.00	\$72.50	0.1
5/2/2024	REVIEW OF COURT'S TENTATIVES MOVING HEARING ON 5/9; COMMS W/ COUNSEL FOR ALL PARTIES RE: SAME.			
2707623	JMR	695.00	\$139.00	0.2
5/2/2024	MULTIPLE FOLLOW UP COMMS RE: ARRANGING FOR NEW MEDIATION DATE.			
2707625	JMR	695.00	\$208.50	0.3

DETAILED ACTIVITIES

Crestlloyd LLC

CASE # 9562

11/13/2024

Page #

22

From Date

11/1/2023

To Date

10/31/2024

5/9/2024 ANALYSIS OF CORRESPONDENCE J. LUCAS RE: MEDIATION

2710803 DBG 725.00 \$72.50 0.1

5/9/2024 ANALYSIS OF CORRESPONDENCE BLUEBOND RE: CONTINUED MEDIATION

2710806 DBG 725.00 \$72.50 0.1

5/9/2024 FOLLOW UP WITH J. LUCAS, COUNSEL FOR YOGI RE: MEDIATION DATES.

2710622 JMR 695.00 \$139.00 0.2

5/13/2024 CONFERENCE CALL WITH RE: MEDIATION WITH BLUEBOND

2711484 DBG 725.00 \$72.50 0.1

5/21/2024 ANALYSIS OF CORRESPONDENCE S. BLUEBOND RE: MEDIATION

2713466 DBG 725.00 \$72.50 0.1

5/21/2024 FURTHER COMMUNICATIONS W/ ALL PARTIES AND J. BLUEBOND RE: MEDIATION PART 2.

2713445 JMR 695.00 \$69.50 0.1

5/21/2024 DRAFT EMAIL TO COUNSEL FOR THE YOGI PARTIES RE: FURTHER MEDIATION.

2713455 JMR 695.00 \$139.00 0.2

6/10/2024 REVIEW OF STATUS OF ACTION / STRATEGIZE RE: NEXT STEPS / MEDIATION.

2719983 JMR 695.00 \$278.00 0.4

7/9/2024 ANALYSIS OF CORRESPONDENCE LUCAS RE: MEDIATION

2728623 DBG 725.00 \$72.50 0.1

7/9/2024 COMMUNICATIONS WITH J. LUCAS, COUNSEL FOR YOGI, RE: STATUS OF POTENTIAL SECOND MEDIATION.

2728603 JMR 695.00 \$208.50 0.3

7/11/2024 CONFERENCE CALL WITH RE: MOVING FORWARD TOWARDS TRIAL AND ENTERING JUDGMENTS

2729349 DBG 725.00 \$290.00 0.4

DETAILED ACTIVITIES

Crestlloyd LLC
CASE # 9562

11/13/2024 **Page #** **23**

From Date **11/1/2023**
To Date **10/31/2024**

7/11/2024 PREPARE FOR AND TELEPHONICALLY ATTEND STATUS CONFERENCE HEARING BEFORE JUDGE SALTZMAN; STRATEGIZE RE: NEXT STEPS.

2729193	JMR	695.00	\$417.00	0.6
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7/11/2024 STRATEGIZE RE: NEXT STEPS IN CRESTLLOYD ADV. PROCEEDING.

2729327	JMR	695.00	\$417.00	0.6
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7/11/2024 REVIEW PRIOR ORDER APPROVING COMPROMISE WITH ENGLANOFF CHILDREN / INVESTIGATE RE: WHETHER SETTLEMENT CONSUMMATED.

2729330	JMR	695.00	\$139.00	0.2
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7/11/2024 COORDINATE W/ RMC RE: MOTIONS FOR DEFAULT JUDGMENT.

2729331	JMR	695.00	\$278.00	0.4
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7/15/2024 REVIEW ORDERS CONTINUING HEARINGS TO 9/17.

2729882	JMR	695.00	\$69.50	0.1
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7/17/2024 ANALYSIS OF CORRESPONDENCE P. SORRELL RE: MEET AND CONFER

2731167	DBG	725.00	\$72.50	0.1
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7/17/2024 SECURED CLAIM ACTIONS - EMAILS WITH PARTIES RE RULE 26 CONFERENCE

2730543	TMA	695.00	\$139.00	0.2
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7/18/2024 COMMUNICATIONS W/ COUNSEL RE: SCHEULDING RULE 26 MEETING OF COUNSEL.

2731014	JMR	695.00	\$139.00	0.2
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7/18/2024 FURTHER STRATEGIZE RE: NEXT STEPS IN ACTION / AREAS TO COVER IN RULE 26 MEETING AND DISCOVERY PLAN.

2731015	JMR	695.00	\$417.00	0.6
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7/23/2024 ANALYSIS OF CORRESPONDENCE P. SORRELL RE: MEET AND CONFER AMONG ALL COUNSEL

2732126	DBG	725.00	\$72.50	0.1
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7/23/2024 FOLLOW UP COMMUNICATIONS WITH COUNSEL RE: SETTING RULE 26 MEETING.

2732089	JMR	695.00	\$69.50	0.1
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DETAILED ACTIVITIES

Crestlloyd LLC

CASE # 9562

11/13/2024

Page #

24

From Date

11/1/2023

To Date

10/31/2024

7/24/2024 ANALYSIS OF CORRESPONDENCE H. STEINBERG RE: MEET AND CONFER

2732417	DBG	725.00	\$72.50	0.1
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7/25/2024 EXCHANGES WITH OPPOSING COUNSEL RE: PROCEEDING WITH LITIGATION WITHOUT MEDIATION

2733675	DBG	725.00	\$145.00	0.2
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7/31/2024 CONFERENCE CALL WITH M. LIEBERMAN RE: STATUS OF LITIGATION AND POTENTIAL RECOVERIES

2734001	DBG	725.00	\$290.00	0.4
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7/31/2024 FURTHER REVIEW AND PREPARE FOR RULE 26 CONFERENCE OF COUNSEL.

2734228	JMR	695.00	\$556.00	0.8
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7/31/2024 PREPARATION OF DRAFT MOTION FOR DEFAULT JUDGMENT.

2738001	RMC	495.00	\$1,138.50	2.3
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8/1/2024 CONTINUE REVIEW AND PREPARE FOR RULE 26 CONFERENCE WITH ALL COUNSEL IN CRESTLLOYD ADVERSARY.

2734308	JMR	695.00	\$1,112.00	1.6
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8/2/2024 CONFERENCE CALL WITH AMONG COUNSEL RE: EARLY MEETING

2734757	DBG	725.00	\$435.00	0.6
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8/2/2024 TELEPHONE CONF. W/ OPP COUNSEL S. GUBNER RE: MSJ RE: SALE REFUND

2734759	DBG	725.00	\$217.50	0.3
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8/2/2024 TELEPHONICALLY ATTEND RULE 26F CONFERENCE OF COUNSEL IN CRESTLLOYD / INFERNO / YOGI / HILDUN ADVERSARY.

2734719	JMR	695.00	\$417.00	0.6
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8/2/2024 COMMS W/ COLIN MORAN RE: GATHERING DOCUMENTS TO MAKE INITIAL RULE 26F DISCLOSURES.

2734787	JMR	695.00	\$139.00	0.2
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8/2/2024 STRATEGIZE RE: CONTENTS OF INITIAL DISCLOSURES.

2734799	JMR	695.00	\$417.00	0.6
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DETAILED ACTIVITIES

**Crestlloyd LLC
CASE # 9562**

11/13/2024 Page # 25

**From Date 11/1/2023
To Date 10/31/2024**

8/5/2024 REVIEW AND ANALYSIS OF DOCUMENTS PREVIOUSLY ATTACHED TO CROSS-COMPLAINT IN PREPARATION FOR PRODUCTION AS PART OF INITIAL DISCLOSURES PER RULE 26(F).

2736159 JMR 695.00 \$556.00 0.8

8/6/2024 PHONE CALL W/ C. MORAN RE: PREPARING DOCUMENTS FOR INITIAL DISCLOSURES.

2735839 JMR 695.00 \$139.00 0.2

8/6/2024 REVIEW, DRAFTING, AND PREPARATION OF INITIAL DISCLOSURES PER RULE 26(F).

2736157 JMR 695.00 \$1,181.50 1.7

8/7/2024 COMMS W/ J. LUCAS RE: RECENT SALES PROCEED BALANCE AND INQUIRIES RE: SAME.

2736508 JMR 695.00 \$139.00 0.2

8/7/2024 INITIAL REVIEW AND ANALYSIS OF SUMMARY OF RULE 26 CONFERENCE CIRCULATED BY COUNSEL FOR INFERNO.

2736509 JMR 695.00 \$139.00 0.2

8/8/2024 ANALYSIS OF DOCUMENTS RULE 26 DISCLOSURES FROM JOHN LUCAS

2736764 DBG 725.00 \$72.50 0.1

8/8/2024 REVIEW OF DOCS FROM CLIENT IN PREPARATION FOR RULE 26F INITIAL DISCLOSURES.

2736822 JMR 695.00 \$973.00 1.4

8/9/2024 ANALYSIS OF CORRESPONDENCE STEINBERG RE: DISCOVERY

2737179 DBG 725.00 \$72.50 0.1

8/9/2024 ANALYSIS OF CORRESPONDENCE J. LUCAS RE: R26 DISCLOSURES

2737180 DBG 725.00 \$72.50 0.1

8/9/2024 REVIEW COMMS W/ COUNSEL FOR HANKEY AND YOGI RE: PROPOSED SCHEDULING ORDER.

2736994 JMR 695.00 \$69.50 0.1

8/9/2024 CONTINUE PREPARE INITIAL DISCLOSURES.

2737202 JMR 695.00 \$834.00 1.2

DETAILED ACTIVITIES

Crestlloyd LLC

CASE # 9562

11/13/2024 Page # 26

**From Date 11/1/2023
To Date 10/31/2024**

8/12/2024 FURTHER COORDINATE RE: DEFAULT JUDGMENT MOTION.

2738562	JMR	695.00	\$139.00	0.2
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8/12/2024 REVIEW DRAFT OF RULE 26 REPORT AND EMAILS RE SAME

2738189	TMA	695.00	\$208.50	0.3
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8/13/2024 FURTHER COORDINATE RE: MOVING FOR DEFAULT AGAINST NIAMI PARTIES.

2738860	JMR	695.00	\$139.00	0.2
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8/13/2024 RESEARCH REGARDING FROW RULE FOR MOTION FOR DEFAULT JUDGMENT AGAINST MULTIPLE DEFENDANTS.

2738919	RMC	495.00	\$742.50	1.5
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8/13/2024 ANALYSIS OF EXHIBITS IN SUPPORT OF MOTION FOR DEFAULT JUDGMENT AND ANALYSIS OF CROSS COMPLAINT.

2738921	RMC	495.00	\$1,089.00	2.2
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8/14/2024 REVIEW OF RESEARCH FROM RMC RE: FROW CASE AND WHETHER TO MOVE FORWARD WITH DEFAULT AGAINST NIAMI ENTITIES; STRATEGIZE RE: NEXT STEPS / SEEKING STRICKEN ANSWER AGAINST NON-REPRESENTED ENTITIES.

2738965	JMR	695.00	\$556.00	0.8
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8/14/2024 FURTHER STRATEGIZE RE: MOVING FORWARD WITH DEFAULT AGAINST NILE NIAMI PARTIES / TAKING DISCOVERY.

2739188	JMR	695.00	\$278.00	0.4
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8/14/2024 RESEARCH REGARDING FROW DOCTRINE FOR PURPOSES OF DEFAULT JUDGMENT.

2739167	RMC	495.00	\$1,534.50	3.1
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8/16/2024 FOLLOW UP RE: FUNDS HELD FROM SALE OF AIROLE PROPERTY.

2739613	JMR	695.00	\$69.50	0.1
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8/16/2024 DRAFTING OF INITIAL DISCLOSURES PER FRCP 26(F).

2739614	JMR	695.00	\$903.50	1.3
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8/19/2024 REVIEW AND ANALYSIS OF SUMMARY OF RULE 26(F) CONFERENCE TO BE PRESENTED TO THE COURT IN ADVANCE OF STATUS CONFERENCE; FURTHER COMMUNICATIONS WITH COUNSEL RE: SAME

2739855	JMR	695.00	\$208.50	0.3
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DETAILED ACTIVITIES

Crestlloyd LLC
CASE # 9562

11/13/2024 **Page #** **27**

From Date **11/1/2023**
To Date **10/31/2024**

8/19/2024 CONTINUE DRAFT RULE 26 INITIAL DISCLOSURES.

2739961 JMR 695.00 \$834.00 1.2

8/19/2024 FOLLOW UP COMMS W/ J. LUCAS, COUNSEL FOR YOGI RE: SALE ACCOUNT BALANCES.

2739962 JMR 695.00 \$69.50 0.1

8/20/2024 FURTHER STRATEGIZE RE: NEXT STEPS IN ADVERSARY PROCEEDING VS. INFERO / YOGI / HILDUN / NIAMI PARTIES.

2740478 JMR 695.00 \$903.50 1.3

8/21/2024 CONTINUE PREPARE INITIAL DISCLOSURES FOR CRESTLLOYD ADVERSARY AND DOCS TO BE PRODUCED CONCURRENTLY WITH SAME.

2740616 JMR 695.00 \$1,181.50 1.7

8/21/2024 FURTHER STRATEGIZE RE: PURSING DEFAULTS AGAINST UNREPRESENTED NIAMI ENTITIES.

2740818 JMR 695.00 \$278.00 0.4

8/22/2024 CONTINUE DRAFT INITIAL DISCLOSURES / REVIEW AND PREPARE DOCUMENTS FOR PRODUCTION.

2740915 JMR 695.00 \$1,181.50 1.7

8/23/2024 CONTINUE DRAFT RULE 26 INITIAL DISCLOSURES AND PREPARE DOCUMENTS FOR PRODUCITON.

2741128 JMR 695.00 \$834.00 1.2

8/23/2024 STRATEGZIE RE: DISCOVERY IN ADVERSARY PROCEEDING.

2741130 JMR 695.00 \$486.50 0.7

8/26/2024 CONTINUE REVIEW / PREPARE DOCUMENTS FOR DISCLOSURES.

2741650 JMR 695.00 \$903.50 1.3

8/27/2024 CONTINUE REVIEW DOCUMENTS IN PREPARATION FOR MAKING RULE 26 INITIAL DISCLOSURES.

2741837 JMR 695.00 \$973.00 1.4

8/28/2024 CONTINUE REVIEW DOCUMENTS AND PREPARE FOR PRODUCTION AS PART OF RULE 26 INITIAL DISCLOSURES.

2742015 JMR 695.00 \$973.00 1.4

DETAILED ACTIVITIES

Crestlloyd LLC
CASE # 9562

11/13/2024 **Page #** **28**

From Date **11/1/2023**
To Date **10/31/2024**

8/30/2024 ANALYSIS OF CORRESPONDENCE STEINBERG RE: EARLY MEETING OF COUNSEL

2742767 DBG 725.00 \$72.50 0.1

8/30/2024 FURTHER DRAFT, REVIEW, AND REVISE RULE 26 INITIAL DISCLOSURES AND PREPARE DOCUMENTS FOR PRODUCTION.

2742676 JMR 695.00 \$556.00 0.8

8/30/2024 COMMS W/ ALL PARTIES RE: EXTENDING DEADLINE TO EXCHANGE INITIAL DISCLOSURES

2742742 JMR 695.00 \$69.50 0.1

9/3/2024 REVIEW AND ANALYSIS OF HILLDUN'S INITIAL DISCLOSURES.

2743199 JMR 695.00 \$834.00 1.2

9/3/2024 EMAILS WITH OPPOSING COUNSEL RE RULE 26 DISCLOSURES AND RELATED DISCOVERY SCHEDULING ISSUES

2742885 TMA 695.00 \$139.00 0.2

9/4/2024 FURTHER DRAFT, REVIEW, AND REVISE INITIAL DISCLOSURE DOCUMENTS.

2743478 JMR 695.00 \$556.00 0.8

9/4/2024 CONTINUE REVIEW DOCUMENTS PRODUCED BY HILDUN AS PART OF INITIAL DISCLOSURES.

2743714 JMR 695.00 \$903.50 1.3

9/5/2024 PREPARATION OF INITIAL DISCLOSURES

2744148 DAMON 300.00 \$180.00 0.6

9/5/2024 CONTINUE REVIEW DOCUMENTS / PREPARE INITIAL DOCS FOR PRODUCTION IN CONNECTION WITH INITIAL DISCLOSURES.

2744060 JMR 695.00 \$1,529.00 2.2

9/5/2024 FURTHER DRAFTING OF INITIAL DISCLOSURES WITH FOCUS ON DAMAGES FIGURES.

2744117 JMR 695.00 \$1,251.00 1.8

9/6/2024 PREPARATION OF DEFENDANT CRESTLLOYD LLC'S INITIAL DISCLOSURES PER FRBP 26(A)(1)

2744574 DAMON 300.00 \$240.00 0.8

DETAILED ACTIVITIES

Crestlloyd LLC
CASE # 9562

11/13/2024 **Page #** **29**
From Date **11/1/2023**
To Date **10/31/2024**

9/6/2024 ANALYSIS OF DOCUMENTS RE: EARLY DISCLOSURES AND DESIGNATIONS

2746065 DBG 725.00 \$217.50 0.3

9/6/2024 REVIEW, REVISE, FINALIZE, AND COORDINATE SERVICE OF RULE 26 DISCLOSURES + DOCS.

2744536 JMR 695.00 \$903.50 1.3

9/6/2024 REVIEW AND ANALYSIS OF INITIAL DISCLOSURES FROM PLAINTIFF INFERNO INVESTMENTS.

2744605 JMR 695.00 \$278.00 0.4

9/6/2024 INITIAL REVIEW AND ANALYSIS OF HANKEY CAPITAL'S INITIAL DISCLOSURES.

2744645 JMR 695.00 \$208.50 0.3

9/6/2024 INITIAL REVIEW AND ANALYSIS OF INITIAL DISCLOSURES FROM YOGI.

2744713 JMR 695.00 \$278.00 0.4

9/6/2024 LIEN LITIGATION - REVIEW INITIAL DISCLOSURES FROM OTHER PARTIES

2744524 TMA 695.00 \$347.50 0.5

9/9/2024 ANALYSIS OF CORRESPONDENCE LUCAS RE: DISCLOSURES

2746066 DBG 725.00 \$72.50 0.1

9/9/2024 COMMS W/ COUNSEL IN ADVERSARY PROCEEDING RE: JOINT STATUS REPORT.

2746100 JMR 695.00 \$139.00 0.2

9/9/2024 LIEN LITIGATION - REVIEW FURTHER SETS OF INITIAL DISCLOSURES AND EMAILS RE SAME WITH OPPOSING COUNSEL

2745748 TMA 695.00 \$417.00 0.6

9/10/2024 ANALYSIS OF DOCUMENTS DRAFT JOINT STATUS REPORT

2746398 DBG 725.00 \$72.50 0.1

9/10/2024 REVIEW OF PROPOSED JOINT STATUS REPORT AND REVISIONS SUGGESTED TO SAME BY COUNSEL FOR YOGI; REVISIONS TO SAME AND COMMS W/ COUNSEL RE: SAME.

2746265 JMR 695.00 \$278.00 0.4

DETAILED ACTIVITIES

Crestlloyd LLC

CASE # 9562

11/13/2024 Page # 30

**From Date 11/1/2023
To Date 10/31/2024**

9/10/2024 LIEN LITIGATION - FURTHER EMAILS WITH OPPOSING COUNSEL RE INITIAL DISCLOSURES AND REPORT TO COURT RE THE SAME

2746240 TMA 695.00 \$278.00 0.4

9/13/2024 COORDINATE RE: DRAFTING DISCOVERY REQUESTS IN CRESTLLOYD ADVERSARY / COMMS W/ RMC RE: SAME.

2747188 JMR 695.00 \$139.00 0.2

9/16/2024 ANALYSIS OF CORRESPONDENCE J. LUCAS RE: DOCUMENT PRODUCTION

2747481 DBG 725.00 \$72.50 0.1

9/16/2024 REVIEW COMMUNICATIONS FROM YOGI RE: PRODUCTION BY HANKEY RE: INITIAL DISCLOSURES.

2747479 JMR 695.00 \$69.50 0.1

9/17/2024 ANALYSIS OF CORRESPONDENCE INFERNO RE: ACCESS TO DOCUMENTS PRODUCED AND RESPOND THERETO

2747819 DBG 725.00 \$72.50 0.1

9/17/2024 TELEPHONICALLY ATTEND STATUS CONFERENCE.

2747793 JMR 695.00 \$278.00 0.4

9/18/2024 COMMUNICATIONS W/ COUNSEL FOR HANKEY CAPITAL RE: PRODUCTION OF INITIAL DISCLOSURES.

2748124 JMR 695.00 \$69.50 0.1

9/19/2024 TELEPHONE CONFERENCE W/ CLIENT RE: DISCOVERY AND SCHEDULING RE: ADVERSARY

2748338 DBG 725.00 \$217.50 0.3

9/19/2024 REVIEW AND ANALYSIS OF CONTINUED SCHEDULING ORDER SERVED BY INFERNO.

2748335 JMR 695.00 \$139.00 0.2

9/19/2024 PREPARE "SEPARATED" DOCS FOR PRODUCTION TO ALL COUNSEL IN ADVERSARY.

2748336 JMR 695.00 \$278.00 0.4

9/19/2024 ANALYSIS OF DOCUMENTS PRODUCED FOR INITIAL DISCLOSURES AND RULES RE DOCUMENT PRODUCTION.

2748466 RMC 495.00 \$544.50 1.1

DETAILED ACTIVITIES

Crestlloyd LLC

CASE # 9562

11/13/2024

Page #

31

From Date

11/1/2023

To Date

10/31/2024

9/23/2024 ANALYSIS OF DOCS FOR INITIAL DISCLOSURES.

2748858	RMC	495.00	\$297.00	0.6
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9/23/2024 PREPARATION OF DISCOVERY REQUESTS, ANALYSIS OF COMPLAINT COUNTERCLAIMS.

2753338	RMC	495.00	\$1,980.00	4.0
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9/24/2024 FURTHER COORDINATE RE: DOCUMENT PRODUCTION OF INDIVIDUALIZED DOCS FOR INITIAL DISCLOSURES.

2749282	JMR	695.00	\$69.50	0.1
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9/24/2024 PREPARATION OF BATES STAMP DOCUMENTS. RE-STAMP DOCUMENTS INDIVIDUALLY

2751618	RM	300.00	\$690.00	2.3
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9/24/2024 ANALYSIS OF EQUITABLE INDEMNIFICATION, EQUITABLE SUBORDINATION, RECHARACTERIZATION OF DEBT FOR PURPOSES OF DISCOVERY REQUESTS.

2753341	RMC	495.00	\$1,485.00	3.0
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9/25/2024 REVIEW OF NEW SET OF BATES STAMPED DOCUMENTS TO PRODUCE WITH INITIAL DISCLOSURES; COORDINATE RE: PRODUCTION OF SAME.

2749499	JMR	695.00	\$139.00	0.2
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9/25/2024 ANALYSIS OF DOCS PRODUCED FOR INITIAL DISCLOSURES.

2749498	RMC	495.00	\$1,485.00	3.0
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9/26/2024 PHONE CALL W/ J. LUCAS, COUNSEL FOR YOGI RE: POTENTIAL AMENDMENT TO COMPLAINT RE: DEED OF TRUST ISSUES WITH HANKEY'S LIENS.

2749554	JMR	695.00	\$347.50	0.5
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9/26/2024 STATEGIZE W/ DBG RE: NEXT STEPS IN CRESTLLOYD ADVERSARY AND YOGI REQUEST TO AMEND COMPLAINT.

2749950	JMR	695.00	\$139.00	0.2
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9/27/2024 PREPARATION OF CORRESPONDENCE CLIENT RE: POSSIBLE AMENDMENT TO COMPLAINT RE: HANKEY SECURITY INTEREST

2749990	DBG	725.00	\$72.50	0.1
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10/1/2024 ANALYSIS OF DOCUMENTS RE: YOGI'S AMENDED ALLEGATION VS. HANKEY SECURED DEBT

2752012	DBG	725.00	\$72.50	0.1
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DETAILED ACTIVITIES

Crestlloyd LLC

CASE # 9562

11/13/2024 Page # 32

**From Date 11/1/2023
To Date 10/31/2024**

10/1/2024 ANALYSIS OF CORRESPONDENCE J. LUCAS RE: AMENDING COMPLAINT RE: HANKEY

2753592	DBG	725.00	\$72.50	0.1
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10/1/2024 EMAILS W/ J. LUCAS RE: REQUEST FOR STIPULATION RE: FILING OF YOGI FIRST AMENDED COMPLAINT.

2751832	JMR	695.00	\$139.00	0.2
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10/2/2024 ANALYSIS OF CORRESPONDENCE L. PERKINS RE: AMENDED COMPLAINT

2751995	DBG	725.00	\$72.50	0.1
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10/2/2024 COMMUNICATIONS W/ J. LUCAS RE: YOGI'S REQUEST TO AMEND COMPLAINT.

2752025	JMR	695.00	\$139.00	0.2
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10/8/2024 FOLLOW UP RE: WRITTEN DISCOVERY DRAFTS TO PROPOUND IN INFERO ADVERSARY / STRATEGIZE RE: CONTENTS OF SAME.

2753917	JMR	695.00	\$139.00	0.2
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10/9/2024 COMMUNICATIONS WITH COUNSEL FOR YOGI (J. LUCAS).

2754208	JMR	695.00	\$139.00	0.2
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10/9/2024 INITIAL REVIEW AND ANALYSIS OF DISCOVERY SERVED BY REXFORD.

2754442	JMR	695.00	\$139.00	0.2
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10/9/2024 STRATEGIZE RE: WRITTEN DISCOVERY TO PROPOUND IN ADVERSARY.

2754547	JMR	695.00	\$208.50	0.3
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10/10/2024 ANALYSIS OF CORRESPONDENCE RE: TRIAL SETTING CONFERENCE

2754534	DBG	725.00	\$72.50	0.1
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10/10/2024 STRATEGIZE RE: RESPONSES TO WITTERN DISCOVERY.

2754792	JMR	695.00	\$486.50	0.7
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10/10/2024 DRAFTING OF WRITTEN DISCOVERY TO PROPOUND ON ALL OTHER PARTIES IN ACTION (YOGI / INFERO).

2754827	JMR	695.00	\$903.50	1.3
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DETAILED ACTIVITIES

**Crestlloyd LLC
CASE # 9562**

11/13/2024 Page # 33

**From Date 11/1/2023
To Date 10/31/2024**

10/11/2024 CONTINUE DRAFT RESPONSES TO DISCOVERY SET ONE.

2755142 JMR 695.00 \$973.00 1.4

10/11/2024 DRAFT DISCOVERY RESPONSE SHELLS FOR RFA; RFP; AND INTERROGATORIES FOR INFERNO AND HANKEY.

2757672 RM 300.00 \$540.00 1.8

10/14/2024 ANALYSIS OF CORRESPONDENCE CLIENT RE: TIMING OF BK WITH PENDING LITIGATION

2755504 DBG 725.00 \$72.50 0.1

10/14/2024 CONTINUE PREPARE DISCOVERY RESPONSES AND DOCUMENTS FOR PRODUCTION IN RESPONSE TO SAME.

2755535 JMR 695.00 \$1,181.50 1.7

10/17/2024 CONTINUE REVIEW DOCUMENTS SENT FROM C. MORAN TO PRODUCE IN DISCOVERY / ORGANIZE AND PREPARE FOR PRODUCTION IN RESPONSE TO RFP SET ONE.

2756283 JMR 695.00 \$1,251.00 1.8

10/18/2024 ANALYSIS OF DOCUMENTS PROPOSED STIP TO AMEND COMPLAINT VS. HANKEY

2756504 DBG 725.00 \$72.50 0.1

10/18/2024 CONFERENCE CALL WITH RE: REQUEST TO PAY DOWN HANKEY

2756505 DBG 725.00 \$145.00 0.2

10/18/2024 FOLLOW UP COMMS FROM J. LUCAS RE: STIP TO AMEND COMPLAINT AND REQUEST TO PAY OFF HANKEY LOAN; STRATEGIZE RE: NEXT STEPS.

2756486 JMR 695.00 \$208.50 0.3

10/18/2024 CONTINUE DRAFT RESPONSES TO RFP SET ONE FROM INFERNO.

2756490 JMR 695.00 \$973.00 1.4

10/18/2024 STRATEGIZE W/ DBG RE: PAYDOWN OF HANKEY DEBT.

2756499 JMR 695.00 \$139.00 0.2

10/21/2024 CONTINUE PREPARE RESPONSES TO WRITTEN DISCOVERY SET ONE FROM INFERNO.

2757088 JMR 695.00 \$1,181.50 1.7

DETAILED ACTIVITIES

Crestlloyd LLC

11/13/2024 Page # 34

CASE # 9562

From Date 11/1/2023
To Date 10/31/2024

10/22/2024 ANALYSIS OF DOCUMENTS PROPOSED STIP TO AMEND COMPLAINT

2757554	DBG	725.00	\$72.50	0.1
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10/22/2024 TELEPHONE CONF. W/ OPP COUNSEL GUBNER RE: AMENDED COMPLAINT

2757555	DBG	725.00	\$145.00	0.2
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10/22/2024 COMMS W/ J. LUCAS RE: STIPULATION TO ALLOW AMENDED PLEADINGS.

2757274	JMR	695.00	\$69.50	0.1
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10/22/2024 REVIEW AND ANALYSIS OF STIPULATION TO ALLOW AMENDED PLEADINGS; STRATEGIZE RE: SAME AND WHETHER TO AMEND DEBTOR'S PLEADINGS.

2757275	JMR	695.00	\$278.00	0.4
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10/22/2024 CONTINUE PREPARE RESPONSES TO RFP SET ONE FROM INFERNO.

2757430	JMR	695.00	\$1,112.00	1.6
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10/23/2024 ANALYSIS OF DOCUMENTS STIP TO AMEND FROM STEINBERG

2757553	DBG	725.00	\$72.50	0.1
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10/23/2024 FURTHER COMMS RE: STIP TO ALLOW AMENDED PLEADINGS.

2757534	JMR	695.00	\$69.50	0.1
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10/23/2024 CONTINUE REVIEW AND PREPARE DOCUMENTS FOR PRODUCTION IN RESPONSE TO INFERNO'S RFP.

2757764	JMR	695.00	\$1,112.00	1.6
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10/24/2024 DRAFT EMAIL TO P. SORRELL, COUNSEL FOR INFERNO, RE: REQUEST FOR EXTENSION OF TIME TO RESPOND TO RFP SET 1.

2757840	JMR	695.00	\$139.00	0.2
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10/25/2024 TELEPHONE CONF. W/ OPP COUNSEL RE: TRIAL AND TIMING IN LIGHT OF AMENDED ALLEGATIONS IN COMPLAINT

2758405	DBG	725.00	\$217.50	0.3
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10/28/2024 ANALYSIS OF ORDER APPROVING STIP FOR LEAVE TO AMEND

2758492	DBG	725.00	\$72.50	0.1
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DETAILED ACTIVITIES

Crestlloyd LLC

CASE # 9562

11/13/2024 Page # 35

From Date 11/1/2023
To Date 10/31/2024

10/28/2024 REVIEW OF DOCUMENT PRODUCTION LINKS FROM INFERO; ADDRESS LOGISTICAL ISSUES PERTAINING TO SAME.

2758416	JMR	695.00	\$139.00	0.2
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10/28/2024 FOLLOW UP COMMUNICATIONS W/ P. SORRELL RE: RESPONDING TO RFP SET ONE FROM INFERO.

2758477	JMR	695.00	\$139.00	0.2
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10/30/2024 ANALYSIS OF CORRESPONDENCE FROM LIEBERMAN RE: ITALIAN LUXURY GROUP AND DISCUSS

2762480	DBG	725.00	\$217.50	0.3
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Total	\$85,425.00	133.4
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INDIVIDUAL ACTIVITIES

11/13/2024 Page 1

Crestlloyd LLC
CASE # 9562

SERVICE RENDERED FROM 11/1/2023 THROUGH 10/31/2024

02 - ASSET DISPOSITION

DBG	0.4	690.00	\$276.00
DBG	0.4	725.00	\$290.00
Total Hours	<hr/> 0.8	Total Fees	<hr/> \$566.00

INDIVIDUAL ACTIVITIES

11/13/2024 Page 2

Crestlloyd LLC
CASE # 9562

SERVICE RENDERED FROM 11/1/2023 THROUGH 10/31/2024

04 - CASE ADMINISTRATION

DBG	0.3	690.00	\$207.00
DBG	2.8	725.00	\$2,030.00
LC	1.0	295.00	\$295.00
LC	9.4	300.00	\$2,820.00
RM	0.1	300.00	\$30.00
TMA	5.1	695.00	\$3,544.50
Total Hours	18.7	Total Fees	\$8,926.50

INDIVIDUAL ACTIVITIES

11/13/2024 Page 3

Crestlloyd LLC
CASE # 9562

SERVICE RENDERED FROM 11/1/2023 THROUGH 10/31/2024

05 - CLAIMS ADMIN. AND OBJECTIONS

DBG	0.3	725.00	\$217.50
TMA	0.2	695.00	\$139.00
Total Hours	0.5	Total Fees	\$356.50

INDIVIDUAL ACTIVITIES

11/13/2024 Page 4

Crestlloyd LLC
CASE # 9562

SERVICE RENDERED FROM 11/1/2023 THROUGH 10/31/2024

07 - FEE / EMPLOYMENT APPLICATIONS

DBG	2.4	690.00	\$1,656.00
JK	0.2	295.00	\$59.00
LC	0.3	295.00	\$88.50
TMA	0.7	650.00	\$455.00
TMA	2.2	695.00	\$1,529.00
Total Hours	5.8	Total Fees	\$3,787.50

INDIVIDUAL ACTIVITIES

11/13/2024 Page 5

Crestlloyd LLC
CASE # 9562

SERVICE RENDERED FROM 11/1/2023 THROUGH 10/31/2024

20 - OTHER LITIGATION

DAMON	1.4	300.00	\$420.00
DBG	12.0	690.00	\$8,280.00
DBG	9.8	725.00	\$7,105.00
JMR	12.4	650.00	\$8,060.00
JMR	68.3	695.00	\$47,468.50
RM	0.3	295.00	\$88.50
RM	4.6	300.00	\$1,380.00
RMC	1.2	450.00	\$540.00
RMC	20.9	495.00	\$10,345.50
TMA	2.5	695.00	\$1,737.50
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Total Hours	133.4	Total Fees	\$85,425.00

PROFESSIONAL ACTIVITY SUMMARY

Crestlloyd LLC

11/13/2024

CASE # 9562

From Date 11/1/2023
To Date 10/31/2024

DAMON	1.4	Hours	@	300.00	\$420.00
DBG	15.1	Hours	@	690.00	\$10,419.00
DBG	13.3	Hours	@	725.00	\$9,642.50
JK	0.2	Hours	@	295.00	\$59.00
JMR	12.4	Hours	@	650.00	\$8,060.00
JMR	68.3	Hours	@	695.00	\$47,468.50
LC	1.3	Hours	@	295.00	\$383.50
LC	9.4	Hours	@	300.00	\$2,820.00
RM	0.3	Hours	@	295.00	\$88.50
RM	4.7	Hours	@	300.00	\$1,410.00
RMC	1.2	Hours	@	450.00	\$540.00
RMC	20.9	Hours	@	495.00	\$10,345.50
TMA	0.7	Hours	@	650.00	\$455.00
TMA	10.0	Hours	@	695.00	\$6,950.00
Total Hours	159.2			Total Fees	\$99,061.50

ACTIVITY SUMMARY

Crestlloyd LLC

11/13/2024

CASE # 9562

From Date 11/1/2023

To Date 10/31/2024

<u>DESCRIPTION</u>	<u>FEES</u>
ASSET DISPOSITION	\$566.00
CASE ADMINISTRATION	\$8,926.50
CLAIMS ADMIN. AND OBJECTIONS	\$356.50
FEE / EMPLOYMENT	\$3,787.50
OTHER LITIGATION	\$85,425.00
TOTAL FEES	\$99,061.50

EXHIBIT B

COSTS BREAKDOWN

11/13/2024

Crestlloyd LLC

CASE # 9562

From Date 11/1/2023

To Date 10/31/2024

11/30/2023	POSTAGE	131.31
11/30/2023	REPRODUCTION COSTS	565.60
12/31/2023	POSTAGE	20.88
12/31/2023	REPRODUCTION COSTS	70.20
11/30/2023	MESSENGER SERVICE	40.22
1/4/2024	COURT RESEARCH PACER	51.40
1/31/2024	POSTAGE	44.61
1/31/2024	REPRODUCTION COSTS	168.20
2/29/2024	POSTAGE	22.40
2/29/2024	REPRODUCTION COSTS	85.00
3/31/2024	POSTAGE	21.12
3/31/2024	REPRODUCTION COSTS	82.60
4/30/2024	POSTAGE	21.12
4/30/2024	REPRODUCTION COSTS	85.20
3/31/2024	COURT RESEARCH PACER	24.70
5/31/2024	WESTLAW RESEARCH	150.67
6/30/2024	REPRODUCTION COSTS	81.80
6/30/2024	POSTAGE	21.12
7/31/2024	POSTAGE	45.37
7/31/2024	REPRODUCTION COSTS	143.40
6/30/2024	COURT RESEARCH PACER	6.10
8/31/2024	POSTAGE	23.28
8/31/2024	REPRODUCTION COSTS	81.80
8/31/2024	WESTLAW RESEARCH	34.16
9/30/2024	REPRODUCTION COSTS	866.40
9/30/2024	POSTAGE	36.72
9/30/2024	COURT RESEARCH PACER	50.30
10/31/2024	POSTAGE	23.28

COSTS BREAKDOWN

11/13/2024

Crestlloyd LLC

CASE # 9562

From Date 11/1/2023

To Date 10/31/2024

10/31/2024

REPRODUCTION COSTS

92.00

COSTS SUMMARY

11/13/2024

Crestlloyd LLC
FILEE # 9562

From Date 11/1/2023
To Date 10/31/2024

REPRODUCTION COSTS	2,322.20
MESSENGER SERVICE	40.22
COURT RESEARCH PACER	132.50
POSTAGE	411.21
WESTLAW RESEARCH	184.83
TOTAL COSTS	\$3,090.96

EXHIBIT C



LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P.
LAW OFFICES

PROFESSIONAL RÉSUMÉ

DAVID L. NEALE began his legal career in New York, with the law firm of Kramer, Levin, Nessen, Kamin & Frankel, where he represented creditors and creditors' committees in large, complex cases such as Texaco Inc., LTV Steel and Charter Co. When Mr. Neale relocated to California in 1989, to join the law firm of Levene & Eisenberg, he brought with him an understanding of creditors' rights and remedies that he was able to apply to the representation of debtors and other constituencies in bankruptcy and workout situations.

His broad experience includes handling cases in a variety of areas including:

Manufacturing (successful Chapter 11 reorganization for companies such as Future Media Productions, a manufacturer of blank CDs and DVDs; California Aircraft & Engines, Inc., a manufacturer of aircraft engine parts with claimants from around the world; DCC Compact Classics, Inc., a manufacturer of specialty CDs and recordings; Fernandes Guitars, a manufacturer of electric and acoustic guitars for distribution around the world); **Food and beverage industry** (Chinois Restaurant, successful Chapter 11 reorganization for a Las Vegas restaurant; Café-Melisse Valencia, successful out-of court workout and orderly liquidation; Galletti Brothers Foods, successful Chapter 11 reorganization for one of the nation's largest fresh seafood wholesalers) Crunchies Food Company, successful Chapter 11 sale of assets of retailer of dried fruit snacks); **Construction** (successful Chapter 11 reorganization for Rock & Waterscape, Inc., builder of water-themed features in Las Vegas and around the world); **Real Estate** (successful Chapter 11 cases for Roosevelt Lofts, LLC, involving a condominium conversion in downtown Los Angeles; North Silver Lake Lodge, LLC, involving one of the last undeveloped parcels of real property in the Deer Valley, Utah ski resort area; IDM Corporation and its affiliates requiring the restructuring of over \$1 billion in debt; and Galletti Brothers Investments, a real estate partnership with multiple properties. He has also represented Ritter Ranch Development, the owner of an 11,000-acre development property in Palmdale; and National Enterprises, Inc. and San Diego Investments, real estate management and development companies with properties across the United States); **Energy** (representing the California Independent System Operator Corporation in connection with the bankruptcy cases of California Power Exchange, Pacific Gas & Electric Co., Enron Inc. and Mirant and its affiliates; Evergreen Oil, an oil re-refining company operating throughout California); **Banking and finance** (Imperial Credit Industries,



DAVID L. NEALE
dln@lnbyg.com

continued. . .

pg 1 of 4



DAVID L. NEALE

PROFESSIONAL RÉSUMÉ

continued from page 1

Inc.); **Trucking** (Green Fleet Systems and TKS Leasing, successfully confirming a plan of reorganization for a short-haul trucking company operating out of the ports of Los Angeles and Long Beach; Coast Bridge Logistics, Inc. representing another short-haul trucking company in connection with the sale of its assets; Consolidated Freightways and its affiliates, in which Mr. Neale represented multi-employer pension funds that were the largest creditors and went on to represent the post-confirmation Plan Oversight Committee and serve as special counsel to the Liquidating Trust in certain litigation and appellate matters, and The Penn Traffic Co. and its affiliates, in which Mr. Neale represented certain multi-employer retirement, health and welfare funds); **Health Care** (Solid Landings Behavioral Health and its affiliates, operators of rehab facilities in California, Texas and Nevada); North American Health Care and affiliates (operators of skilled nursing facilities); **Technology and Communication** (WCI Cable, Inc., a fiber optic cable network located in Oregon and Alaska); and **Retail** (successful Chapter 11 cases for Ortho Mattress, Inc., a manufacturer and retailer of bedding products; Britches of Georgetowne, Inc., a clothing retailer with outlets in several states). Mr. Neale has a particular expertise in the **Entertainment Industry**. He has represented clients involved in **publishing** (New Millennium Entertainment, Buzz Magazine); **film exhibition** (Resort Theaters of America); **film production** (Franchise Pictures, LLC and its affiliates); The Samuel Goldwyn Company in connection with its acquisition of Heritage Entertainment); **music** (Even St. Productions, LLC, the owner of rights relating to the catalogue of Sly & the Family Stone) and **artists** (Gladys Knight, Mick Fleetwood, Lynn Redgrave, among others). He has also successfully represented numerous individual Chapter 11 debtors with respect to personal real estate holdings and liabilities and other financial difficulties. Mr. Neale has also represented numerous purchasers, equity interest holders, creditors and official committees in many Chapter 11 cases around the country. This is a small sample of the cases he has handled over his almost 30-year legal career.

Mr. Neale is both an experienced and aggressive litigator whose cases have resulted in over a dozen notable published opinions by the Bankruptcy Court, District Court and Ninth Circuit Court of Appeals. He also brings his negotiating skills to bear as a member of the Mediation Panel for the Bankruptcy Court for the Central District of California. He is a member of the American Bar Association, Association of the Bar of the City of New York, New York County Bar Association, Century City Bar

continued. . .

pg 2 of 4



DAVID L. NEALE

PROFESSIONAL RÉSUMÉ

continued from page 2

Association, Beverly Hills Bar Association, Financial Lawyers Conference, Turnaround Management Association, and the Commercial Law League of America. He has served on the Board of Directors of the AIDS Project Los Angeles and the Los Angeles division of the American Friends of Hebrew University.

Mr. Neale received his B.A., *summa cum laude* from Princeton University in 1984 and his J.D. from Columbia University School of Law in 1987. He was admitted to the New York Bar in 1988 and the California Bar in 1989. He was admitted to the Ninth Circuit Court of Appeals in 1989, and was admitted to the United States District Court for the Southern and Eastern Districts of New York in 1988. In 1989, he was admitted to the Central, Eastern, Northern and Southern Districts of California. He has also practiced extensively in courts around the country, in venues as diverse as Oregon, Arizona, Nevada, Texas, Arkansas, Utah, Florida, New York, Delaware and Tennessee.

Mr. Neale is the author of:

- “Bankruptcy and Contractual Relations in the Entertainment Industry – An Overview,” *1990 Entertainment, Publishing and the Arts Handbook*
- “A Survey of Recent Bankruptcy Decisions Impacting upon the Entertainment Industry,” *1992–1993 Entertainment, Publishing and the Arts Handbook*
- “SEC Actions and Stays,” *National Law Journal*, 2002
- “The Scope and Application of 11 U.S.C. § 1145,” American Bankruptcy Institute Bankruptcy Battleground West, 2003
- “Whose Life is it Anyway? Treatment of Unique Assets in Bankruptcy,” American Bankruptcy Institute Winter Leadership Conference, 2016

He was featured as a “Mover & Shaker” by *The Deal* magazine in 2006, and has been interviewed several times by, among others, KNX news radio in Los Angeles, *Variety* magazine, *The Hollywood Reporter*, and the *California Real Estate Journal* on bankruptcy topics.

Mr. Neale has appeared as a speaker on the following topics before the following organizations:

- “Making the Best Better: Lessons From the Battlefield,” Turnaround Management Association 6th Annual Spring Meeting, 1998

continued. . .

pg 3 of 4



DAVID L. NEALE

PROFESSIONAL RÉSUMÉ

continued from page 3

- "Litigation Issues in Bankruptcy," Business Torts – An Introduction and Primer, Consumer Attorneys Association of Los Angeles, 1998
- "There Must Be Fifty Ways to Leave Your Troubles," Turnaround Management Association, 1998
- "The Impact of State Court Decisions in Bankruptcy Court," Beverly Hills Bar Association, 2001

Mr. Neale has appeared as a panelist, addressing issues relating to:

- "Bankruptcy in the Dot-Com Economy" and "Licensing Agreements: How to Draft and Enforce Them" for Law.Com Seminars
- "Public Company Debtors and the SEC," American Bankruptcy Institute Bankruptcy Battleground West, 2003; "The 2005 Amendments to Bankruptcy Code Sections 546(c) and 547 – The Early Returns," Financial Lawyers Conference, 2008
- "Transfers of Intellectual Property," Southwestern Law School, Bankruptcy in the New Millennium, 2010
- "Practicing in the Limelight: Celebrity Bankruptcies," American Bankruptcy Institute Winter Leadership Conference, 2016
- "Shark Tank," American Bankruptcy Institute Bankruptcy Battleground West, 2018

Mr. Neale has consistently been named by *Los Angeles* magazine as one of its 100 "Super Lawyers" in the bankruptcy field, and has been recognized by Chambers & Partners as one of the top practitioners within the bankruptcy/restructuring field in California.



LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P.
LAW OFFICES

PROFESSIONAL RÉSUMÉ

RON BENDER is a founding and co-managing partner of Levene, Neale, Bender, Yoo & Golubchik L.L.P., one of the premier insolvency boutique law firms in the State of California. The firm was founded in 1995. Ron has successfully reorganized and restructured the debt of numerous companies, sold countless companies, and restructured the financial affairs and debts of many individuals. He is widely regarded as a highly creative, results oriented bankruptcy, insolvency and restructuring attorney who is able to tackle complex financial and legal problems and develop and implement creative solutions. Ron has repeatedly been listed by "Super Lawyers" as one of the top 100 lawyers in Southern California in regional surveys of his peers.

Ron received his undergraduate degree in Finance from the prestigious Wharton School of Business at the University of Pennsylvania in 1986 where he graduated first in his class (B.S., summa cum laude), and then obtained his law degree from Stanford University Law School in 1989. During law school, Mr. Bender served as a judicial extern for the Honorable Lloyd King, U.S. Bankruptcy Court, Northern District of California Bankruptcy Court.

Ron has one of the largest bankruptcy and insolvency practices in the State of California, having represented hundreds of chapter 11 debtors. A sampling of some of Ron's chapter 11 bankruptcy representations includes: a 400,000 square foot shopping center in Lynwood, California known as "**Plaza Mexico**" that Ron recently sold for \$164 million; the **TRX** exercise band company that Ron recently sold for \$11.1 million; **Zacky and Sons Poultry** (a large grower, processor, packager and seller of chicken and turkey related products) that Ron recently sold for approximately \$40 million; **West Coast Distribution** (a premier technology driven supply chain management, logistics warehousing, fulfillment and 3PL distribution services provider for the apparel industry) that Ron recently sold; **Tatung Company of America** (a manufacturer and distributor of consumer electronics with over \$20 million assets that Ron successfully reorganized); **NAI Capital** (the well known commercial real estate brokerage firm that Ron successfully sold); **Ironclad Performance Wear** (a leading, technology-focused developer and manufacturer of high-performance task-specific gloves and apparel for the "industrial athlete" that Ron sold for \$25 million); **Rdio** (a digital music service provider) that Ron sold to Pandora for \$75 million; **Country Villa** (one of the largest owners and operators of skilled nursing facilities



RON BENDER
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pg 1 of 3



RON BENDER

PROFESSIONAL RÉSUMÉ

continued from page 1

with annual revenue of more than \$200 million that Ron sold for \$62 million); **Pebble ABC** in a sale to Fitbit for \$20 million; **Gamma Medica** (a manufacturer of imaging systems in the biotechnology field that Ron sold); **Matterhorn Group** (a large manufacturer of novelty ice cream products that Ron sold); **Fat Burger** (the well known chain of hamburger restaurants that Ron sold); **Westcliff Medical Laboratories** (an owner and operator of 170 patient service center laboratories and labs throughout California with \$95 million of annual revenue and 1,000 employees that Ron sold for \$57.5 million); **LifeMasters Supported Selfcare** (a national disease management company with annual revenue of \$80 million that Ron sold); **Bodies in Motion** (a chain of fitness facilities that Ron sold for approximately \$10 million); **Max Equipment Rental** (an equipment rental company that Ron successfully reorganized); **Nelson & Associates** (a manufacturers' representative in the electrical industry that Ron successfully reorganized); **Alin Party Supply** (a retail chain of party supplies that Ron successfully reorganized); **Lake San Marcos Resort & Country Club; Pacific High Reach** (a large construction equipment rental company that Ron sold for \$17 million); **Krystal Koach** (a large manufacturer of limousines and shuttle buses that Ron sold); **Small World Toys** (a toy company that Ron sold for approximately \$16 million); **Intervisual** (a children's book company that Ron sold for approximately \$10 million); **LightPointe Communications** (a manufacturer of wireless networking equipment that Ron successfully reorganized); **Nicola** (a large olive importer and distributor that Ron successfully reorganized); **Krispy Kreme** (an owner and operator of Krispy Kreme Doughnut Stores that Ron successfully reorganized); **Pleasant Care** (an owner and operator of skilled nursing facilities with annual revenue of approximately \$200 million that Ron sold for approximately \$17 million); **Sega GameWorks** (a retail entertainment based company operating under the name of "GameWorks," with \$60 million of annual revenue, that Ron sold for approximately \$8 million); **Alliant Protection Services** (a commercial and residential alarm services company with 16,000 customers that Ron sold for \$14.5 million); **The Walking Company** (a national chain of 101 retail stores selling specialty shoes and footwear that Ron successfully reorganized); **Shoe Pavilion** (a chain of 117 retail stores selling off-price footwear with locations in the Western and Southwestern United States that Ron sold); **Gadzoox Networks** (a publicly traded company engaged in the business of providing networking infrastructure for storage and data management, where

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pg 2 of 3



RON BENDER

PROFESSIONAL RÉSUMÉ

continued from page 2

one division was sold for \$8.5 million and the balance of the company successfully reorganized); **State Line Hotel, State Line Casino, Jim's Enterprises** (two hotels and casinos located in West Wendover, Nevada known as the State Line Hotel and Casino and the Silver Smith Hotel and Casino that Ron sold for \$55 million); **Easyrider and Paisano Publications** (publicly traded publishers of thirteen national magazines that Ron sold for \$12.3 million); **Clifford Electronics** (a manufacturer of automotive aftermarket and original equipment manufacturer security systems and components, primarily for automobiles, with annual sales of \$40 million, that Ron sold for \$20 million); **Chorus Line Corporation and California Fashions Industries** (one of the largest apparel companies in the country at that time with annual sales of \$500 million); **Avus** (a distributor of computer systems with sales of in excess of \$100 million that Ron sold); **A.J. Markets** (chain of supermarkets that Ron sold for \$5 million); **Trancas Town** (owner of 35 acres of raw developable land in Malibu, California that Ron successfully reorganized); **Association of Volleyball Professionals** (professional beach volleyball league that Ron sold); **Louise's Trattoria** (chain of 16 Italian food restaurants with \$30 million in annual revenue that Ron sold for \$7 million); **Westward Ho Markets** (a supermarket chain with \$50 million of annual revenue and \$20 million of debt that Ron successfully reorganized); **Special Effects Unlimited** (one of the largest providers of special effects in the movie industry that Ron successfully reorganized); **Santa Barbara Aerospace** (a heavy aircraft maintenance facility located at the former Norton Air Force base in San Bernardino, California, that Ron successfully reorganized and then sold); **Manchester Center** (a 1.5 million square foot shopping center in Fresno, California that was Ron sold for \$25 million); **Marbella Golf and Country Club** (a golf and country club located in San Juan Capistrano that Ron successfully reorganized); **Southwest Hospital** (an acute care hospital located in Riverside that Ron successfully reorganized). Ron has also represented countless owners of real estate in chapter 11 that have resulted in successful sales or reorganizations.

Ron is also one of California's leading lawyers and preeminent experts in the field of Assignments for the Benefit of Creditors (ABC's), having represented assignees in approximately 200 ABC's.

Ron is also a frequent author and speaker on bankruptcy and insolvency matters.



LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P.
LAW OFFICES

PROFESSIONAL RÉSUMÉ

TIMOTHY YOO, a partner of the firm, specializes in commercial litigation and bankruptcy. Known throughout the region as a bankruptcy attorney who resolves difficult issues with creativity and efficiency, he consistently earns the highest rating in peer surveys, including being repeatedly listed as a “Super Lawyer.”

Mr. Yoo received his undergraduate degree in business from University of Southern California with honors in 1987. He then obtained his law degree from Loyola Law School with full merit scholarship in 1991. Mr. Yoo completed a one-year clerkship with the Honorable Lisa Hill Fenning, United States Bankruptcy Judge for the Central District of California. In March, 1998, he was appointed to the Panel of Chapter 7 Bankruptcy Trustees for the Central District of California. Besides serving as a Chapter 7 Trustee, Mr. Yoo also serves in numerous cases as a Chapter 11 Trustee, Bankruptcy Ombudsman, Liquidating Trustee, and Chief Restructuring Officer.

Mr. Yoo’s wide range of experience includes Taeil Media (represented a multinational Korean corporation in one of the largest Orange County fraud cases); Destination Films (acted as Chapter 7 trustee to liquidate a large film library); Winston Tires (represented the Chapter 7 Trustee); Millennium-Pacific Icon Group (acted as Chapter 11 Trustee of one of the largest Korean American real estate developer); Daewoo Motors (defended creditors in preference actions); Bodies in Motion (acted as the first Consumer Privacy Ombudsman in the Central District of California to advise the court on a sale of a chain of fitness facilities); Small World Toys (represented the creditors’ committee); Chorus Line Corporation and California Fashions Industries (acted as a liquidating trustee for one of the largest apparel companies in the country); IT Wheels (successfully defended a Chapter 7 Trustee in a Chapter 15 proceeding); Aoki Pacific Corporation (as Chapter 7 Trustee, completed public works projects); Dick Cepke, Inc. (acted as Chapter 7 Trustee to liquidate a chain of off-road vehicle parts stores); and Phoenix MC, Inc. (acted as the Chief Restructuring Officer for a hybrid automobile manufacturer).

Mr. Yoo has lectured as a panelist in programs sponsored by Lorman Education Services, Office of the United Trustee and the National Asian Pacific American Bar Association. He also frequently writes for the *Korea Times* and California Continuing Education of the Bar.



TIMOTHY J. YOO
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LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P.
LAW OFFICES

PROFESSIONAL RÉSUMÉ

DAVID B. GOLUBCHIK, born Kiev, Ukraine, January 10, 1971; admitted to bar 1996, California. Education: University of California, Los Angeles (B.A. 1992), Pepperdine University School of Law (J.D., 1996). Vice Chairman, Moot Court Board; Vice Magistrate, Phi Delta Phi International Legal Fraternity; American Jurisprudence Award in Business Reorganization in Bankruptcy. In addition to the State Bar of California, admitted to the U.S. District Court, Central, Southern, Eastern and Northern Districts of California. Law Clerk to the Honorable Thomas B. Donovan, United States Bankruptcy Court, Central District of California (1996–1997). Member, American, California and Los Angeles Bar Associations, American Bankruptcy Institute (Board of Advisors), Financial Lawyers Conference, Los Angeles Bankruptcy Forum and Beverly Hills Bar Association (Executive Committee). Practice emphasizes bankruptcy, corporate insolvency and creditors' rights. Language: Russian.

Articles written by David Golubchik include:

- "Representing Closely Held Corporations in Bankruptcy: The Ethical Dilemma," Commercial Lawyers' Association Conference, November 1999
- "Bankruptcy Law – A Debtor's Press Release," *National Law Journal*, May 29, 2000
- "Taking a Piece of the Action in Bankruptcy," Bay Area Bankruptcy Forum Conference, June 6, 2000
- "Bankruptcy Law – Unwinding Settlements," *National Law Journal*, October 23, 2000
- "Bankruptcy Law – Involuntary Proceedings," *National Law Journal*, February 2, 2004
- "The Rights Of A Lessee In A Lessor's Bankruptcy: Section 365(h) Of The Bankruptcy Code," Los Angeles County Bar Association, Real Estate Subsection, March 25, 2004
- "Defending Nondischargeability Actions in Bankruptcy," Public Counsel, 2002–2004
- "Outlooks and Strategies For Distressed Commercial Real Estate Loans," Grubb and Ellis presentation, May 14, 2009
- "Chapter 11 Focus: Small Business and Single Asset Real Estate Cases," Los Angeles County Bar Association, Commercial Law and Bankruptcy Subsection, January 27, 2010



DAVID B. GOLUBCHIK
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LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P.
LAW OFFICES

PROFESSIONAL RÉSUMÉ

EDUCATION

University of Maryland (B.A., 1971)
University of Maryland School of Law (J.D., with Honors, 1974)

BAR ADMISSIONS

Maryland, 1974, California, 1976
U.S. District Court, 1976
U.S. Court of Appeals for the Ninth Circuit, 1978
U.S. Supreme Court, 1980

GARY E. KLAUSNER joined LNBYG as a senior partner in May 2014, from a senior shareholder position at Stutman, Treister & Glatt P.C. Mr. Klausner has exclusively practiced in the field of corporate restructuring and bankruptcy since 1976.

Mr. Klausner represents Chapter 11 debtors, secured and unsecured creditors, creditors' committees, trustees and receivers, licensors and franchisors, purchasers of assets out of bankruptcy cases and parties involved in litigation and appeals in connection with bankruptcy cases. He has handled cases involving a broad range of businesses and industries including manufacturing, retail, real estate development, hospitality and restaurants, aerospace, entertainment, healthcare, financial institutions, and transportation.

Mr. Klausner also has expertise in Chapter 9 of the Bankruptcy Code, which is designed for the reorganization of municipalities. Mr. Klausner was the lead lawyer in the Chapter 9 case of Valley Health System in which he successfully confirmed a Chapter 9 Plan of Adjustment.

Mr. Klausner's significant engagements as debtor's counsel include: Meruelo Maddux Properties, Inc. (Special Reorganization Counsel); Imperial Capital Bancorp, Inc.; Colorep, Inc., International Union of Operating Engineers, Local 501, Mr. Gasket Co.; Prism Entertainment Corporation; Packaging Corporation of America; Super Shops, Inc.; Cannon Pictures; Maguire Thomas Partners, Fifth & Grand, Ltd.; ABC International Traders, Inc.; Maxicare and Watts Health Foundation, Inc., dba UHP Healthcare.



GARY E. KLAUSNER
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Honors and Recognitions

Fellow, American College of Bankruptcy, 2010
Century City Bar Association: Bankruptcy Lawyer of the Year, 2012
Selected, Super Lawyers (Bankruptcy & Creditor/Debtor Rights) 2004–12
Selected, Southern California's Best Lawyers in America, 2011–12

Publications/Press

"Section 1111(b) "Look Before You Leap," *2 Bankruptcy Study Group Journal* 15 (1986)
"Chapter 11 'The Bank of Last Resort,'" *The Business Lawyer*, November, 1989; Vol. 45, No. 1
"The New Bankruptcy Rules," *4 Bankruptcy Study Group Journal* 64 (1987).

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pg 1 of 3



GARY E. KLAUSNER
PROFESSIONAL RÉSUMÉ

continued from page 1

Mr. Klausner has represented creditors' committees in cases such as Rhythm & Hues, Inc., Nasty Gal, Inc., Consolidated Freightways, New Meatco, Westward Ho Markets, Naki Electronics, Prime Matrix, The Movie Group, American Restaurant Group ("Black Angus"), and Solidus Networks, Inc.

Mr. Klausner has also represented principals involved in significant chapter 11 cases, such as Relativity Media Inc., The Weinstein Company, EZ Lube; Rachel Ashwell Design, Inc. ("Shabby Chic"); and Comic Book Movies LLC.

In addition to client matters, Mr. Klausner has been actively involved and has held prominent positions in local and national professional organizations and bar associations. Mr. Klausner is a member of the Board of Governors of the Financial Lawyers Conference and served as its president from 1993 through 1994. He is a board member of the Los Angeles Bankruptcy Forum (serving as its president in 2003–2004), a member of the American Bar Association, Section on Business Law, where he chaired a task force on The Economics of Chapter 11 Practice, chaired the Subcommittee on Bankruptcy Fraud, Crimes and Abuse of the Bankruptcy Process, and chaired the Chapter 9 and Chapter 11 Subcommittees. He is a member of the Los Angeles County Bar Association, where he has served as a member of the Executive Committee of the Commercial Law and Bankruptcy Section as well as being Vice-Chair of the Section's Bankruptcy Committee.

In 2010, Mr. Klausner was elected as a Fellow of the American College of Bankruptcy, and in 2012, Mr. Klausner was recognized as "Bankruptcy Lawyer of the Year" by the Century City Bar Association.

Mr. Klausner has also served as a Lawyer Representative to The Ninth Circuit Judicial Conference and chaired the United States District Court Standing Committee On Attorney Discipline.

Mr. Klausner speaks frequently on subjects involving bankruptcy and commercial law and has published numerous articles on bankruptcy-related topics.

Speaking Engagements

Panelist, "Bank Holding Company Bankruptcies," ABI Battleground West, 2012

Panelist, "Municipal Bankruptcies," ABI Battleground West, 2011

Panelist, "Municipal Bankruptcies," ABA Fall Meeting Business Law Section, 2010

KEY REPRESENTATIONS

Debtor Representations

Colorep, Inc.

International Union of Operating Engineers, Local 501

St. Tropez Capital, Inc.

Mr. Gasket Co.

Prism Entertainment Corporation

Packaging Corporation of America
Super Shops, Inc.

Maguire Thomas Partners, Fifth & Grand, Ltd.

ABC International Traders, Inc.

Maxicare, HMO

Watts Health Foundation, Inc., dba UHP Healthcare, HMO

Valley Health System, Healthcare District

Imperial Capital Bancorp, Inc.

Mereulo Maddux Properties, Inc

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pg 2 of 3



GARY E. KLAUSNER
PROFESSIONAL RÉSUMÉ

continued from page 2

He is a member of the bar of the states of California and Maryland, and is admitted to practice before the United States Supreme Court, the United States Courts of Appeals for the Ninth Circuit, and the United States District and Bankruptcy Courts for the Central District of California.

Mr. Klausner received his J.D., with honors, from the University of Maryland School of Law in 1974, where he served on the editorial staff of the University of Maryland Law Review from 1972–73. He received his B.A. from the University of Maryland in 1971.

PROFESSIONAL AFFILIATIONS

Financial Lawyers Conference (President, 1993–1994; Member of the Board of Governors)

Los Angeles Bankruptcy Forum (President in 2003–2004) Ninth Circuit Judicial Conference (2007–2009)

United States District Court, Central District, Standing Committee on Attorney Discipline, Chair 2011–2013

American Bar Association Section on Business Law, Chair of the Subcommittee on Bankruptcy Crimes, Fraud and Abuse, 2005

Chair of the Subcommittee on Chapter 9, 2011–2016; Chair of Chapter 11 Subcommittee, 2017–2020

HONORS AND RECOGNITIONS

Fellow of the American College of Bankruptcy Century City Bankruptcy Lawyer of the Year, 2010

Selected, Super Lawyers (Bankruptcy & Creditor/Debtor Rights) 2004–16 Selected, Southern California's Best Lawyers in America, 2011–12

KEY REPRESENTATIONS

Committee Representations

Rhythm & Hues

Nasty Gal

New Meatco

Consolidated Freightway

Westward Ho Markets

Naki Electronics

Prime Matrix Stan Lee Media

American Restaurant Group, Inc

Significant Creditor/Party In Interest Representations

The Weinstein Company

Relativity Media

Cannon Pictures, Inc.

Georgia Pacific Corporation

Cal Worthington

Columbia Tristar

Fox Family Worldwide

MCI Telecommunications Corporation

Paramount Pictures

Saban Entertainment

Sony Pictures, Inc.

The Walt Disney Company

Victor Valley Community Hospital

Rachel Ashwell Design, Inc

EZ Lube, Inc

Gardens Regional Hospital



LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P.
LAW OFFICES

PROFESSIONAL RÉSUMÉ

EDWARD M. WOLKOWITZ has focused on the areas of insolvency and commercial law during more than 40 years of practice. He has represented debtors, creditors, trustees, receivers and creditors' committees in a wide variety of cases. He also serves as a chapter 11 and chapter 7 panel trustee in the Central District of California and as a receiver for the Los Angeles Superior Court. He has extensive experience in representing various interests in complex reorganization cases in a number of different and diverse industries and has also operated a number of businesses as a trustee and receiver. He is also AV rated by Martindale-Hubbell.

He has been involved in a number of cases that have made new law or clarified existing law in the Ninth Circuit, including: Wolkowitz v. FDIC, 527 F. 3d 959 (9th Cir. 2008); Wolkowitz v. Beverly, 551 F. 3d 1092 (9th Cir. 2008); In re Sylmar Plaza, LP, 314 F.3d 1070 (9th Cir. 2002); Wolkowitz v. American Research Corporation, 131 F.3d 788 (9th Cir. 1999); In re Moses, 167 F.3d 470 (9th Cir. 1999); Wolkowitz v. Shearson Lehman Bros., 136 F.3d 655, cert. denied, 525 U.S. 826 (1998); In re Cheng, 943 F.2d 1114 (9th Cir. 1991); In re Qintex Entertainment, 950 F.2d 1492 (9th Cir. 1991); In re WLB_RSK Venture, 296 B.R. 509 (Bankr. C.D. Cal. 2003).

Mr. Wolkowitz was on the faculty of Southwestern University Law School from 1978 to 1994, rejoining the faculty in 2001, teaching courses in bankruptcy, commercial transactions and business reorganization. He has also lectured extensively for the California Continuing Education of the Bar, and as a panelist in programs sponsored by the American Bankruptcy Institute, the Los Angeles Bankruptcy Forum, and the Beverly Hills Bar Association. Between 1994 and 2002, he served as a member of the City Council of Culver City, California, including two one-year terms as Mayor of Culver City.

Mr. Wolkowitz was admitted to the California Bar in 1976. His educational background is as follows: California State University, Northridge (B.A., 1971); Southwestern University Law School (J.D., *cum laude*, 1975); The University of Michigan Law School (LL.M., 1976).



**EDWARD M.
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pg 1 of 2



EDWARD M. WOLKOWITZ

PROFESSIONAL RÉSUMÉ

continued from page 1

His publications include:

- "Debtors Have New Weapons Against Involuntary Bankruptcy," *Journal of Corporate Renewal* 12 (December 2007)
- "Bankruptcy and Family Law: A Marriage of Irreconcilable Differences", 24 *B.H. Bar J.* 83 (1990)
- "Insolvency and Bankruptcy," (Chapter 7) *California Family Law Service, Bancroft-Whitney* (1986)
- "Legislative Analysis—Land Use Proposals," 8 *Southwestern University Law Review* 216 (1976)
- "Land Use Controls: Is there a Place For Everything," 6 *Sw.U.L.Rev.* 607 (1974)

He is a member of the State Bar of California, the American Bar Association, Los Angeles County Bar Association, the Los Angeles Bankruptcy Forum, the Financial Lawyers Conference and the National Association of Bankruptcy Trustees. He has served as President and Vice President of the Los Angeles Bankruptcy Forum; the Editorial Board of the California Bankruptcy Journal; and, the Executive Committee of the Board of Governors of the Financial Lawyers Conference.



LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P.
LAW OFFICES

PROFESSIONAL RÉSUMÉ

BETH ANN R. YOUNG, born Santa Monica, California, June 30, 1964; Admitted to California State Bar, December, 1989; **Admitted** to the United States District Court, Central, Eastern, Northern and Southern Districts of California and the United States Court of Appeals for the Ninth Circuit.

Education: University of California at Los Angeles (B.A., 1986); Loyola Law School (J.D., 1989).

Member: California Bar Association, American Bar Association, Los Angeles County Bar Association, Century City Bar Association, Financial Lawyers' Conference and Los Angeles Bankruptcy Forum.

Bankruptcy Court Panel Mediator: United States Bankruptcy Court, Central District of California, January 2014 through the present; Certificated Completion of Mediation Training Program: Straus Institute for Dispute Resolution, Pepperdine School of Law, January 2014.

Reported Decisions: San Paolo U.S. Holding Company v. 816 South Figueroa Company (1998) 62 Cal. App. 4th 1010, 1026; and Ziello v. First Federal Bank (1995) 36 Cal. App. 4th 321, 42 Cal. Rptr. 2d 251.



BETH ANN R. YOUNG
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LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P.
LAW OFFICES

PROFESSIONAL RÉSUMÉ

MONICA YOUNG KIM was admitted to the California Bar in 1995, after graduating from the University of California at Berkeley (B.A., 1991) and Hastings College of the Law (J.D., 1995). She was a Law Clerk to the Honorable Jane Dickson McKeag, U.S. Bankruptcy Judge, Eastern District of California, 1995–96. Ms. Kim has worked solely in the areas of bankruptcy, insolvency and business reorganization, and commercial and real estate transactions, representing debtors, creditors' committees, creditors, sellers, and purchasers. She joined Levene, Neale, Bender, Yoo & Golubchik L.L.P. in 1996, and became a partner in 2004.

Ms. Kim is also involved in out-of-court restructuring transactions, including assignments for creditors, representing sellers/assignors, assignees and buyers. Her experience has included representation in retail, healthcare, entertainment, manufacturing, real estate, service and technology. Ms. Kim is a member of the American Bar Association, Los Angeles County Bar Association, Century City Bar Association, Women Lawyers Association of Los Angeles, and the Korean American Bar Association, and is admitted to the Central, Eastern, Northern and Southern Districts of California.



MONICA Y. KIM
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LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P.
LAW OFFICES

PROFESSIONAL RÉSUMÉ

PHILIP A. GASTEIER'S more than 40 years of practice has included a broad range of bankruptcy and insolvency representation, including Chapter 11 debtors, trustees in Chapter 7 and Chapter 11 cases, creditors, committees, buyers, landlords and parties to executory contracts, with particular emphasis on complex reorganizations and structuring transactions.

In his first decade of practice in Philadelphia, Mr. Gasteier successfully represented landlords and purchasers of leasehold interests in large cases such as Food Fair and Lionel, and participated in preparation of materials for presentation to Congress in connection with hearings leading to the Shopping Center Amendments to the Bankruptcy Code in 1984. He counseled extensively in connection with insolvency and bankruptcy aspects of commercial leases for shopping centers and retail chains, and authored "Shopping Centers As Utilities Under the Bankruptcy Code," *Shopping Center Legal Update*, Summer, 1983. Mr. Gasteier also provided insolvency counseling in connection with bond and other securities transactions. Mr. Gasteier was involved in representation of creditor or equity committees in matters including Franklin Computer, Manson-Billard Industries and Monroe Well Service, Inc. Debtor representation included Motor Freight Express, a multi-state motor carrier, and Dublin Properties.

Mr. Gasteier's practice in Los Angeles has included entertainment and other intellectual property matters, such as Fries Entertainment, Inc., Qintex Entertainment, Inc., and Hal Roach Studios, Inc. where he was primarily responsible for structuring and confirming chapter 11 plans, as well as representation of Carolco Pictures, Inc. and Paramount Studios. He has provided specialized insolvency counseling and litigation support in connection with numerous transactions, licenses and other entertainment contracts. Mr. Gasteier argued In re: Qintex Entertainment, Inc., 950 F.2d 1492 (9th Cir. 1991) to the Ninth Circuit U.S. Court of Appeals, a principal case establishing the executory contract analysis applicable to copyright licenses, and determining that participation rights constitute unsecured claims. Other debtor representation has included Currie Technologies Inc.; Wavien, Inc.; Ocean Trails L.P.; Superior Fast Freight, Inc.; and B.U.M. International, Inc. Mr. Gasteier has been involved in creditor committee representation in cases such as House of Fabrics, California Pacific Funding, Ltd., Condor Systems, Inc. and Chase Technologies, Inc.

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pg 1 of 2



PHILIP A. GASTEIER
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PHILIP A. GASTEIER
PROFESSIONAL RÉSUMÉ

continued from page 1

Mr. Gasteier is a graduate of the Law School of the University of Pennsylvania (J.D. 1977) and the Ohio State University (B.A. 1974). He was admitted to the Pennsylvania Bar in 1977 and to the California Bar in 1987. He is also a member of the bar of the United States District Court, Central, Eastern and Northern Districts of California; the U.S. District Court, Eastern District Court of Pennsylvania, and the Ninth and Third Circuit Courts of Appeals. He is a member of the American Bankruptcy Institute, the American Bar Association, the State Bar of California, the Century City Bar Association, the Financial Lawyers Conference and the Los Angeles County Bar Association, where he served as a member of the Bankruptcy Sub-Committee of the Section on Commercial Law and Bankruptcy from (1990–1992). He has been active in civic affairs, and is a past President (2008–2009), Vice President (2006–2008) and Board Member (2004–2009) of the Greater Griffith Park Neighborhood Council, an official body of the City of Los Angeles.

pg 2 of 2



LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P.
LAW OFFICES

PROFESSIONAL RÉSUMÉ

DANIEL H. REISS, a partner at Levene, Neale, Bender, Yoo & Golubchik L.L.P. (“LNBYG”), has specialized in the area of bankruptcy and insolvency for over thirty years. Before entering the legal field, Mr. Reiss started his professional career at KPMG (then Peat, Marwick and Mitchell) and became a Certified Public Accountant specializing in tax structuring in mid-market and entrepreneurial businesses. Mr. Reiss graduated from California State University, Northridge, *summa cum laude*, B.S., Business Administration in 1984. Mr. Reiss’s business education and background is of significant importance in dealing with the complex financial issues facing distressed business situations.

Armed with practical business knowledge, Mr. Reiss decided to pursue a career in law and graduated in 1990 from Loyola University Law School where he was a staff writer and notes editor of the *Law Review*, president of Phi Delta Phi legal honor fraternity, and was a member of the St. Thomas More Honor Society.

Mr. Reiss joined LNBYG in November 2000. Mr. Reiss is a member of the executive committee of the Bankruptcy Section of the Beverly Hills Bar Association, and is a member of the Los Angeles Bankruptcy Forum, Financial Lawyers Conference and the Los Angeles County Bar Association. Mr. Reiss has been honored as a “Super Lawyer” multiple times since 2006 in a region-wide survey, an honor bestowed on only 5% of Southern California attorneys.

Mr. Reiss’s bankruptcy experience extends to cases and distressed situations involving public utilities, healthcare, retail, aviation, hospitality, real estate, bio-tech and general manufacturing. Mr. Reiss regularly represents debtors, creditor committees, secured creditors, bankruptcy trustees and buyers of distressed assets and companies. Mr. Reiss is a frequent speaker before trade and legal groups, and is a nationally published author on bankruptcy issues.

Mr. Reiss is also an experienced bankruptcy litigator, having been lead counsel in more than 100 adversary proceedings in bankruptcy court. When not representing the bankruptcy entity or a trustee, Mr. Reiss has successfully petitioned the Court to confer standing on his clients to file litigation on behalf of the estate. Mr. Reiss also has expertise in removing state court litigation to the bankruptcy court and dealing



DANIEL H. REISS
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pg 1 of 3



DANIEL H. REISS

PROFESSIONAL RÉSUMÉ

continued from page 1

with complex jurisdictional issues. Litigation targets commonly include company directors, officers and other insiders, recipients of avoidable asset transfers, or creditors holding invalid liens or claims.

Mr. Reiss's published articles include:

- “Bankruptcy Battlegrounds in Franchising,” *Franchise Law Insider*, 3rd Quarter 2005
- “Assignment of Leases,” *National Law Journal*, Winter 2006
- “Travelers Cas.’ Part II,” *National Law Journal*, Winter 2007.
- “Single-Asset Real Estate,” *National Law Journal*, Summer 2008.
- “D&O Moves to the Forefront in Bankruptcy Cases,” *National Law Journal*, Summer 2009.
- “Protecting Interests in the Event of Tenant Bankruptcies,” *National Law Journal*, Spring 2010.
- “When Cases In Two Bankruptcy Courts Clash,” *National Law Journal*, Fall 2010
- “Marshall Case Raises Issue Of Consent To Jurisdiction” *National Law Journal*, Summer 2011
- “Bidders At Bankruptcy Auctions, Beware,” *National Law Journal*, Summer 2012
- “What’s a Class Action Plaintiff To Do?” *National Law Journal*, Summer 2013

Mr. Reiss's speaking engagements include:

- “Franchise Issues in Bankruptcy,” Spring, 2004, Franchise Business Network.
- “Hostile Takeovers in Bankruptcy Cases,” Credit Managers Association.
- “Directors and Officers Litigation in Bankruptcy,” Spring, 2008, Turnaround Management Association and Beverly Hills Bar Association.
- “Healthcare Business Bankruptcies,” Spring 2009, Los Angeles County Bar Association, Healthcare Law and Commercial Law And Bankruptcy Sections
- “Bankruptcy Battlegrounds in Franchising,” Fall, 2009, Southern California Franchise Business Network.
- “Class-Action Claims Against Bankrupt Defendants An Overview,” Summer 2013, State Bar of California, San Francisco, California

continued. . .

pg 2 of 3



DANIEL H. REISS

PROFESSIONAL RÉSUMÉ

continued from page 2

- "TIC TALK - Issues in Tenant in Common Bankruptcy Cases and Related Considerations," Spring 2015, Beverly Hills Bar Association – Bankruptcy Law and Real Estate Law Sections
- Panelist, Wage and Hour and Other Employment Issues Facing Troubled Companies, AIRA 34th Annual Conference, Nashville, Tenn. 2018.

pg 3 of 3



LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P.
LAW OFFICES

PROFESSIONAL RÉSUMÉ

TODD A. FREALY, a partner of the firm, represents Chapter 7 trustees throughout Southern California in all aspects of case administration and litigation. In July 2010, Mr. Frealy was appointed to the panel of Chapter 7 trustees for the Riverside Division of the United States Bankruptcy Court. Mr. Frealy currently serves as a Chapter 11 trustee and Chapter 7 trustee in cases pending in the Central District of California. Mr. Frealy is a graduate of Southwestern University School of Law (J.D. 1998) and the University of California, Los Angeles (B.A. 1995). During law school he was an extern to the Honorable Mitchel R. Goldberg and Honorable Arthur M. Greenwald, U.S. Bankruptcy Judges for the Central District of California. After law school, he clerked for the Honorable David N. Naugle, U.S. Bankruptcy Judge, Central District of California, Riverside Division (1998–2000). Mr. Frealy was a member of the Board of Directors for the Inland Empire Bankruptcy Forum from 2009–2014 and was a member of the Southwestern University School of Law Alumni Board of Directors (September 2006 to June 2009). He is also a member of the Los Angeles County Bar Association and the Los Angeles Bankruptcy Forum. In 2021, Mr. Frealy was recognized as a “Super Lawyer” by *Super Lawyers* magazine. He was admitted to the California Bar in 1998, and is admitted to the Central, Eastern, Northern and Southern Districts of California.



TODD A. FREALY
taf@lnbyg.com

Articles written by Mr. Frealy include:

- “Dazed and Confused,” *California Bankruptcy Court Reporter*, Vol. 4, No. 3, March 2000 (Dischargeability of student loans and the “undue hardship test”)
- “Finding the Key,” *California Bankruptcy Court Reporter*, Vol. 4, No. 6, June 2000 (How to Set off Mutual Debts in Bankruptcy)

Mr. Frealy is a frequent speaker on bankruptcy issues, including:

- Southwestern Law Review’s symposium: “Bankruptcy in the New Millennium,” February 2010
- Inland Empire Bankruptcy Forum: “Disclosed and Undisclosed Assets In Chapter 7,” April 2014
- Inland Empire Bankruptcy Forum: “Hot Topics In Consumer Chapter 7 Proceedings,” November 2014
- Inland Empire Bankruptcy Forum: “An Evening With The Trustees,” April 2015

continued. . .

pg 1 of 2



TODD A. FREALY

PROFESSIONAL RÉSUMÉ

continued from page 1

- Riverside County Bar Association: "What Every Non-Bankruptcy Lawyer Should Know About Bankruptcy (And Should Be Afraid Not To Ask)," December 2015
- Inland Empire Bankruptcy Forum: "An Evening With The Trustees," March 2016

pg 2 of 2



LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P.
LAW OFFICES

PROFESSIONAL RÉSUMÉ

RICKY STEELMAN is a senior litigator at Levene, Neale, Bender, Yoo & Golubchik L.L.P. Mr. Steelman's client-centered and resolution-driven practice focuses on complex commercial disputes, including litigation connected to bankruptcy, restructuring and insolvency. His extensive business litigation experience includes successful representation of individuals, Fortune 500 companies, hospitals, and emergency physician groups in state and federal courts, private arbitrations, and more than 75 appeals in the various appellate districts of the California Courts of Appeal, as well as the United States Court of Appeals for the Ninth Circuit.

Not only an experienced appellate attorney and litigator, Mr. Steelman also has substantial bankruptcy experience in numerous bankruptcy matters and adversary proceedings. Specifically, he played a critical role in obtaining summary judgment (resulting in a published decision in favor of a Fortune 100 financial institution) where the bankruptcy court granted his plaintiff client's request for substantive consolidation. That judgment forced seven non-debtor entities and three non-debtor individuals involved in a multi-million dollar mortgage-relief fraud scheme into the primary debtor-entity's Chapter 7 bankruptcy and under the purview of the bankruptcy court. This resulted in better protections for vulnerable consumers and members of the community, as well as financial institutions and corporations.

In addition to his significant class action defense work in federal court, Mr. Steelman has appeared numerous times in California probate court. He first chaired a probate trial where he successfully challenged the executor's final accounting of a probate estate and the executor's request for extraordinary fees in connection with that estate. That probate decision after a multiple-day trial resulted in greater financial distributions to Mr. Steelman's client, as well as several other non-profit organizations across the country.

Mr. Steelman is very proud to be a two-time Cooke Scholar after being selected for the 2002 Jack Kent Cooke Foundation Undergraduate Scholarship and the 2006 Jack Kent Cooke Foundation Graduate Scholarship – a rare and coveted accomplishment in today's competitive world. He is also honored to have been named a Southern California Super Lawyers "Rising Star" each year since 2013.

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pg 1 of 2



**RICHARD P.
STEELMAN, JR.**
rps@lnbyg.com



RICHARD P. STEELMAN, JR.

PROFESSIONAL RÉSUMÉ

continued from page 1

Prior to joining the firm, Mr. Steelman worked more than 8.5 years at Bryan Cave Leighton Paisner LLP as a litigation, appellate, and class action associate. He also worked at Buchalter as special counsel, focusing on complex healthcare litigation relating to provider-payor disputes. Mr. Steelman graduated *magna cum laude* from Pepperdine University with a B.A. in Political Science and a Music Minor in 2003. He graduated *cum laude* from Pepperdine University School of Law in 2009. Mr. Steelman is licensed in all California state and federal courts and the U.S. Court of Appeals for the Ninth Circuit. He is a member of the California Society for Healthcare Attorneys, the American Health Lawyers Association, the Los Angeles County Bar Association and its Appellate Courts, Litigation, and Healthcare Law sections.

pg 2 of 2



LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P.
LAW OFFICES

PROFESSIONAL RÉSUMÉ

JULIET Y. OH is a partner at Levene, Neale, Bender, Yoo & Golubchik L.L.P. representing individuals and corporations in Chapter 11 bankruptcy cases, out-of-court restructuring proceedings and bankruptcy litigation proceedings. She has been voted a “Rising Star” in a poll of her peers in Southern California each year since 2006.

Ms. Oh has recently represented Chapter 11 debtors Anna's Linens, Inc., Green Fleet Systems, LLC, Belasco Unlimited Corporation, Apex Digital, Inc., Roosevelt Lofts, LLC, Central Metal, Inc., Franchise Pictures LLC, et al., Fatburger Restaurants, and the Official Committee of Unsecured Creditors of Halcyon Holding Group.

Prior to joining the firm in 2003, Ms. Oh specialized in the representation of individuals in Chapter 7 and Chapter 13 cases and worked as an extern with the Office of the U.S. Trustee, Central District of California. Ms. Oh is a graduate of Stanford University and obtained her law degree from University of California, Los Angeles. She was admitted to the California Bar in 2000, is a member of the Korean American Bar Association, California Bankruptcy Forum and Los Angeles Bankruptcy Forum.



JULIET Y. OH
jyo@lnbyg.com

pg 1 of 1



LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P.
LAW OFFICES

PROFESSIONAL RÉSUMÉ

TODD M. ARNOLD has been with LNBY&G since 2003. Mr. Arnold specializes in corporate and high net worth individual reorganizations and bankruptcy litigation. Mr. Arnold has served as counsel in several major reorganization cases and in hundreds of avoidance actions. Mr. Arnold joined LNBYG after serving as an extern and a law clerk to the Honorable Thomas B. Donovan, United States Bankruptcy Judge. He has been voted a "Rising Star" in a poll of his peers in Southern California each year since 2006. A native of Sacramento, Mr. Arnold graduated from the University of California, Los Angeles with a B.A. in English and Loyola Law School, Los Angeles, *cum laude*, with a Juris Doctor degree and as a member of the Order of the Coif.



TODD M. ARNOLD
tma@lnbyg.com

pg 1 of 1



LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P.
LAW OFFICES

PROFESSIONAL RÉSUMÉ

ANTHONY A. FRIEDMAN specializes in the representation of debtors in reorganizations and liquidations, Chapter 7 and Chapter 11 Trustees, bankruptcy litigation, State Court litigation, and creditors' committees. Mr. Friedman is admitted to practice before all the Courts of the State of California, the United States District Court, Central, Eastern, Northern and Southern Districts, the Ninth Circuit Court of Appeals and the United States Supreme Court. Mr. Friedman received his Juris Doctor degree from the University of La Verne School of Law in 1999 and his Bachelor of Arts degree from the University of California at San Diego in 1992. Prior to joining Levene, Neale, Bender, Yoo & Golubchik L.L.P., Mr. Friedman was a judicial extern for the Honorable Kathleen Thompson, United States Bankruptcy Judge, Central District of California. Mr. Friedman is also a member of the American Bankruptcy Institute, the Los Angeles County Bar Association, the Los Angeles Bankruptcy Forum, the California Bankruptcy Forum, the Financial Lawyer's Conference, the James T. King Bankruptcy Inn of Court (current Board member and past president 2017–2018), and several Southern California Bar Associations. Mr. Friedman is also a volunteer in the Public Counsel Law Center Bankruptcy pro bono project.



ANTHONY A. FRIEDMAN
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LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P.
LAW OFFICES

PROFESSIONAL RÉSUMÉ

KURT RAMLO, a Los Angeles native, provides restructuring advice to business organizations facing financial distress. His practice includes guiding organizations through out-of-court and chapter 11 reorganizations, as well as related transactions and litigation. He routinely provides advice on structuring cutting-edge transactions on behalf of public and private debtors, foreign representatives, receivers, shareholders, plan sponsors, third-party acquirers, secured and unsecured creditors, creditors' committees and post-petition lenders, as well as other restructuring professionals. A former Assistant United States Attorney, Mr. Ramlo also has extensive trial and commercial litigation experience in bankruptcy and federal district courts.

His representative chapter 11 matters include advising the debtors in NexPrise, Inc.; Hingham Campus; Minor Family Hotels; Delphi Corporation; Refco; Blue Bird Body Company (prepackaged plan); Friedman's Jewelers; First Virtual Communications; Kmart Corporation; ZLOG, Inc. (prepackaged plan); Stone & Webster; Wilshire Center Marketplace (Ambassador Hotel); Washington Group; and Furr's Supermarkets; the foreign representatives in Flightlease Holdings and SunCal; the receiver in private equity management group; equity stockholders or plan sponsors in Charter Communications; Crescent Jewelers; Oregon Arena Corporation; Old UGC; and Clift Holdings (The Clift Hotel); asset purchasers and bidders in Medical Capital Holdings; Variety Arts Theatre; Chef Solutions Holdings; People's Choice Financial Corporation; Sun World; The Walking Company; Centis; and iSyndicate; estate professionals in General Growth Properties and Leap Wireless; and creditors in Cocopah Nurseries; One Pelican Hill North, L.P.; McMonigle Residential Group; Contessa Premium Foods; LBREP/L-Lehman SunCal Master I, LLC; Phoenix Coyotes; GTS 900 F (Concerto); Cupertino Square; American Home Mortgage; Trump Casinos; Consolidated Freightways; Loral Space & Communications; Leap Wireless; DirecTV Latin American; Northwestern Corporation; Airwalk; Centis; Regal Cinemas; eToys; Excite/At Home Corporation; Paracelsus Healthcare; and the creditors' committee in Hamakua Sugar Company.

Litigation matters include CanAm Capital Holdings (Ponzi scheme fraudulent transfer action); Lyondell Chemical (New York LBO fraudulent transfer action); Linens N Things (preference); patent holder (obtaining stay pending appeal of \$112 million judgment); S&W Bach (New York fraudulent transfer action); One Pelican Hill North

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pg 1 of 2



KURT RAMLO
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KURT RAMLO

PROFESSIONAL RÉSUMÉ

continued from page 1

(California lender liability); Lost Lakes (Washington lender liability); satellite dish provider (piracy and dischargeability); Prium (lender liability); Spansion, Inc. (transfer pricing dispute); Delphi (Michigan state tax litigation; vendor litigation); Refco (Swiss securities litigation); Old UGC (\$3.7 billion breach of merger action); Airwalk (debt recharacterization trial); various actions representing the United States (Medicare fraud and dischargeability; surety bond enforcement; loan and guaranty enforcement; wrongful foreclosure litigation; enforcement of criminal fines and restitution orders).

Published decisions issued in matters litigated by Mr. Ramlo include United States Pac. Ins. Co. v. United States Dep't of Interior, 70 F. Supp. 2d 1089 (C.D. Cal. 1999); Secretary of HUD v. Sky Meadow Assoc., 117 F. Supp. 2d 970 (C.D. Cal. 2000); Yunis v. United States, 118 F. Supp. 2d 1024 (C.D. Cal. 2000); and United States Dep't of Educ. v. Wallace (*In re Wallace*), 259 B.R. 170 (C.D. Cal. 2000).

He is a co-author of “American Bankruptcy Reform and Creativity Prompt the *In re Blue Bird Body Company One-Day Prepackaged Plan of Reorganization*,” International Corporate Rescue, Kluwer Law International (London) (December 2006), included in Expedited Debt Restructuring: An International Comparative Analysis, Rodrigo Olivares-Caminal ed., Kluwer Law International (The Netherlands) (2007).

In 1993, Mr. Ramlo obtained his law degree from the University of California, Davis and in 1990 a Bachelor of Music degree, with a concentration on music performance on bassoon, from California State University, Northridge.



LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P.
LAW OFFICES

PROFESSIONAL RÉSUMÉ

MICHAEL G. D'ALBA joined LNBYG in May 2024 as Senior Counsel. He represents Chapter 7 trustees in investigations and avoidance actions, including on appeal. His practice extends to representing partition referees, receivers, judgment creditors, and debtors in possession in litigation matters.

Prior to joining LNBYG, Mr. D'Alba practiced at a bankruptcy law firm in Los Angeles for 14 years. His experience there included representing the receiver of a Ponzi scheme in avoiding and recovering transfers and liquidating other assets; prevailing for the trustee on appeal when a transferee argued that a one-year statute of limitations under state law should apply over a two-year statute of limitations under bankruptcy law; avoiding unequal property settlement agreements that were followed by bankruptcy; enforcing the discharge injunction on behalf of reorganized debtors, obtaining monetary sanctions; collecting judgments, including by judicial foreclosure; and selling by auction the intellectual property assets of a defunct media enterprise. During this time, he authored *Non-filing Spouses, Homestead Exemptions, and Voidable Transactions*, 34 CAL. BANKR. J. 77 (2017), and *Based on What? Trustee Compensation Scenarios Under Section 326 of the Bankruptcy Code*, 35 CAL. BANKR. J. 339 (2021) (Brad D. Krasnoff, co-author).

Mr. D'Alba is a member of the Financial Lawyers Conference, the Los Angeles Bankruptcy Forum, and the Century City Bar Association. He has participated in the James T. King Bankruptcy Inn of Court and volunteered for Public Counsel's bankruptcy pro bono program.

Upon graduating from Princeton University and Rutgers University School of Law, Mr. D'Alba practiced in the commercial litigation department of a New Jersey law firm, which included representing Chapter 11 debtors in the residential real estate development industry.

EDUCATION

Rutgers University School of Law · Newark, NJ

J.D., May 2005

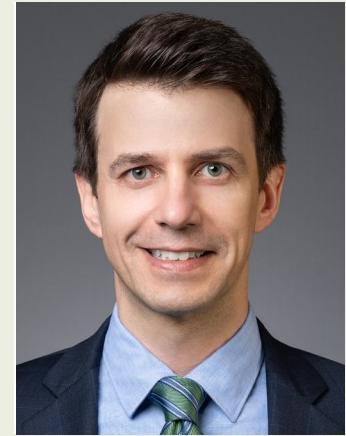
Academic Honors: Dean's Merit Scholarship, 2004-2005 and 2002-2003;
Aaron Lasser & Hon. Lawrence L. Lasser Scholarship, 2003-2004

Johann Wolfgang Goethe-Universität · Frankfurt am Main, Germany

Fellow, German Academic Exchange Service, 1998-1999

Princeton University · Princeton, NJ

A.B. History, 1998



MICHAEL G. D'ALBA
mgd@lnbyg.com

continued. . .

pg 1 of 4



MICHAEL G. D'ALBA
PROFESSIONAL RÉSUMÉ

continued from page 1

PROFESSIONAL EXPERIENCE

**Feb. 2010 to
present**

Danning, Gill, Diamond & Kollitz, LLP · Los Angeles, CA · Associate

- Investigate and prosecute avoidance actions by Chapter 7 trustees; includes handling of appeals
- Investigate debtor disclosures, then prepare and conduct examinations at 341(a) meetings
- Judgment enforcement, including by judicial foreclosure actions in Superior Court Represent Superior Court Partition Referee
- Represented Chapter 11 debtor vehicle rental company, enforced discharge injunction post-confirmation
- Represented receiver of Ponzi scheme in district court action

**Sep. 2008 to
Feb. 2010**

Khalaf & Khalaf · Pasadena, CA · Paralegal, then California-licensed Attorney

- Interviewed clients and investigated their claims
- Drafted complaints, demurrers, motions, ex parte applications, discovery requests, and notices of claim
- Defended depositions
- Attended court hearings of ex parte applications, case management conferences, and initial appearance, pursuant to Penal Code Section 977, on DUI claim

**Sep. 2006 to
July 2008**

Greenbaum, Rowe, Smith & Davis LLP · Iselin, NJ · Associate in Litigation

Department

- Represented Chapter 11 debtor Kara Homes and related entities
- Researched whether method of soliciting political campaign contributions violated criminal statutes
- Represented Chapter 11 debtor Kara Homes and related entities
- Researched whether method of soliciting political campaign contributions violated criminal statutes
- Represented lumber supplier in construction defect litigation; represented party to title insurance litigation
- Took and defended depositions; interviewed witnesses; researched and drafted jury charges; attended and argued motion hearings

**Jan. 2008 to
May 2008**

Raritan Valley Community College · North Branch, NJ · Adjunct Professor

Designed and taught semester-long undergraduate course on basic litigation procedure in paralegal certification program

continued. . .

pg 2 of 4



MICHAEL G. D'ALBA
PROFESSIONAL RÉSUMÉ

continued from page 2

PROFESSIONAL EXPERIENCE *continued*

- Sep. 2005 to Sep. 2006** **Honorable Allison E. Accurso, Superior Court of New Jersey · Trenton, NJ · Law Clerk**
• Conducted case management conferences involving pro se litigants in family court
• Researched and drafted tentative decisions of motions, orders, and statements of reasons
• Assisted court in interviewing children in connection with custody disputes
- Jan. 2000 to Aug. 2002** **Bloomberg LP · Princeton, NJ · Research Analyst**
Maintained pricing content from over fifty European banks; provided customer service to clients worldwide, including German-speaking clients; mentored new employees
- June to Aug. 1997** **Deutsche Bank AG · Cologne, Germany**
Assisted officials of bank's Foreign Department handling transactions between German exporters and buyers in developing economies
- June to Aug. 1997** **Bayerische Versicherungsbank AG · Munich, Germany**
Worked as a consultant to the personnel department executive evaluating employees
- June to Aug. 1994** **Chicago Board of Trade · Chicago, IL**
Served as floor clerk to trader in open-outcry trading pit in which 30-year U.S. Treasury Bond Futures contracts were traded; reviewed trades and confirmed trades with other parties

LEGAL INTERNSHIPS

- Jan. to May 2005** **Honorable William G. Bassler, United States District Court · Newark, NJ**
Prepared orders on habeas corpus petitions filed by New Jersey prisoners
- Aug. 2004 to May 2005** **Rutgers Urban Legal Clinic · Newark, NJ**
• Successfully argued for dismissal of domestic violence restraining order used to evict tenant
• Represented apartment building tenants in dispute with landlord over conditions; inspected conditions; met with tenants to discuss strategy; held meeting with landlord and tenants to try to reach settlement
- May to Aug. 2004; Aug. to Dec. 2003** **State of New Jersey, Office of the Attorney General · Newark, NJ**
Researched New Jersey Board of Public Utilities' regulatory power over telecommunications; translated complaint into German for international service of process; digested deposition transcripts
- June to Aug. 2003** **Honorable Neil H. Shuster, New Jersey Superior Court · Trenton, NJ**
Researched procedural issues and drafted bench memoranda in chancery court

continued. . .

pg 3 of 4



MICHAEL G. D'ALBA
PROFESSIONAL RÉSUMÉ

continued from page 3

ADMISSIONS

State Bar California, 2009

State Bar of New Jersey, 2005 (lapsed)

PUBLICATIONS

Michael G. D'Alba, *Non-filing Spouses, Homestead Exemptions, and Voidable Transactions*, 34 CAL. BANKR. J. 77 (2017).

Brad D. Krasnoff, Michael G. D'Alba, *Based on What? Trustee Compensation Scenarios Under Section 326 of the Bankruptcy Code*, 35 CAL. BANKR. J. 339 (2021).

Third Circuit Addresses the Fiduciary Obligations of Future Representatives Under 11 U.S.C. § 524(g): In re Imerys Talc America, Inc., 38 F.4th 361 (3d Cir. 2022) (October 5, 2022), Danning, Gill, Israel & Krasnoff, LLP Insights Blog.

Ninth Circuit to Consider Whether Mechanic's Lien is Enforceable in Bankruptcy Case (Oct. 27, 2022), Danning, Gill, Israel & Krasnoff, LLP Insights Blog.

Fraudulent Transfer Claim Defendant Obtains Insurance Coverage for Defending Claim (Dec. 16, 2022), Danning, Gill, Israel & Krasnoff, LLP Insights Blog.

Chicago District Court Considered Non-Debtor's Attempt to Extend Protection of Automatic Stay from the Los Angeles Bankruptcy Cases of Girardi and Girardi & Keese (Jan. 20, 2023), Danning, Gill, Israel & Krasnoff, LLP Insights Blog.

PROFESSIONAL ASSOCIATIONS

Member, Financial Lawyers Conference

Member, Century City Bar Association



LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P.
LAW OFFICES

PROFESSIONAL RÉSUMÉ

EVE H. KARASIK is a business restructuring and bankruptcy attorney who focuses her practice on the representation of business entities in a variety of industries. In addition to representing corporate debtors, Ms. Karasik has represented creditors' committees, equity committees, post-confirmation liquidating trusts and Bankruptcy Code section 524(g) trusts, assignees and assignors for assignments for the benefit of creditors, receivers and creditors in state and federal receiverships, and significant creditors and litigation parties in cases pending around the country. She began her legal career at Stutman, Treister & Glatt P.C., a nationally recognized bankruptcy boutique where she practiced until May 1, 2014 when the firm had to close its doors.

Ms. Karasik has a breadth of experience representing entities in wide variety of industries,. Some of her debtor representations of note include: Valley Economic Development Corporation (Los Angeles, CA, *Loan Origination and Servicing*), Marshall Broadcasting, Inc. (Houston, TX, *Media*), Cornerstone Apparel, Inc. (Los Angeles, CA, *Retail*), Anna's Linens, Inc. (Los Angeles, CA, *Retail*), Associated Third Party Administrators and Allied Fund Administrators LLC (Los Angeles, CA, *Benefits Administration*), Imperial Capital Bancorp, Inc. (San Diego, CA, *Bank Holding Company*), Utah 7000, LLC, et al (Salt Lake City, UT, *Luxury Real Estate Development*), Resort at Summerlin, et al (Las Vegas Nevada, *Gaming*); Gold River Hotel & Casino, et al (Las Vegas, Nevada, *Gaming*), Falcon Products, Inc., et al (St. Louis, MO, *Furniture Manufacturer*), Clark Retail Group, et al (Chicago, IL, *Gas Station and Convenience Stores*), MJ Research, Inc. (Reno, NV, *Bio Tech*), Cell Pro, (Seattle, Washington, *Bio Tech*); and U.S. Aggregates, Inc., et al (Reno, NV, *Mining*). Her creditor and equity committee representations include PHI, Inc. (Dallas, TX, *Oil and Gas Logistics*), New Meatco Provisions, LLC (Los Angeles, CA, *Food Distribution*), Circus and Eldorado Joint Venture, et al. (Reno, NV, *Gaming*), Riviera Holdings Corporation, et al. (Las Vegas, NV, *Gaming*), Eurofresh, Inc., et al (Phoenix, AZ, *Food Producer and Distributor*), USA Capital First Trust Deed Fund (Las Vegas, NV, *Real Estate Investment Fund*), Aladdin Gaming, Inc. (Las Vegas, NV, *Gaming*), and Amerco (Reno, NV, *Retail/Trucking*).

Ms. Karasik has also served as counsel to the Trustee in the Securities Investor Protection Corporation liquidation proceeding of W.S. Clearing, Inc. (Los Angeles, CA, *Securities Clearinghouse*), counsel to the Examiner in the Fontainebleau Las Vegas Holdings, LLC., et al. (Miami, FL, *Gaming*), and counsel to the J.T. Thorpe

continued. . .

pg 1 of 4



EVE H. KARASIK
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EVE H. KARASIK

PROFESSIONAL RÉSUMÉ

continued from page 1

Settlement Trust, the Thorpe Insulation Company Settlement Trust, Plant Insulation Settlement Trust, and the Western Asbestos Settlement Trust (Reno, NV, Section 524(g) *Bankruptcy Trusts*).

Ms. Karasik is a fellow in the American College of Bankruptcy. She has been ranked in Chambers USA, Band 3, Bankruptcy and Restructuring, California 2020. Ms. Karasik has received several awards in her field, including the Century City Bar Association Bankruptcy Attorney of the Year for 2015, and the Turnaround Managers Association “2007 Large Company Transaction of the Year” award for her work on the U.S.A. Commercial Mortgage Company Chapter 11 Cases. She is also been named a Southern California States Super Lawyers®, 2012–2020 for Bankruptcy & Creditor/Debtor Rights; Best Lawyers in America®, Bankruptcy and Creditor-Debtor Rights Law, 2007– 2020; and AV/Preeminent Attorney® as rated by Martindale-Hubbell®, 5.0 out of 5.0.

Ms. Karasik has appeared as a speaker on the following topics before the following organizations:

- American Bankruptcy Institute, Annual Spring Meeting, 2019, The Continuing Vitality of the Jay Alix Protocol, and other Issues Related to the Retention of Distressed Management Consultant
- American Bankruptcy Institute, Bankruptcy Battleground West, 2019, Crossfire Panel: Jevic Debate
- American Bankruptcy Institute, Annual Spring Meeting, 2018, Life After Jevic: How Will the Supreme Court’s Decision Affect Chapter 11 Practice
- California Bankruptcy Forum 2016, Mo Fees Mo Objections – Notoriously B.I.G. Problems for Professionals Seeking to be Employed and Paid
- American Bankruptcy Institute, Winter Leadership Conference 2015, Perfecting the Pitch
- Turnaround Managers Association, 7th Annual Western Regional Conference July 16, 2015: “Successor Liability & Section 363 Sales: Everything You Always Wanted to Know, But Were Afraid Someone Would Tell You”
- American Bankruptcy Institute, Spring Meeting 2015: “Trustee Selection in Commercial Bankruptcy Cases: Who Wins the Battle to Control the Estate?”
- Los Angeles Bankruptcy Forum: “LLCs in Bankruptcy: Tricks and Traps (or Points of Leverage and Lurking Dangers),” April 20, 2015

continued. . .

pg 2 of 4



EVE H. KARASIK

PROFESSIONAL RÉSUMÉ

continued from page 2

- American Bankruptcy Institute, Spring Meeting 2014: “The Ever-Changing Roles of Committees”
- American Bankruptcy Institute, Webinar July 15, 2013: “The Section 1111(b) Election, Plan Feasibility and Cramdown Issues”
- American Bankruptcy Institute, Spring Meeting 2013: “The Section 1111(b) Election, Plan Feasibility and Cramdown Issues”
- American Bankruptcy Institute, Southwest Bankruptcy Conference, 2011: “Great Debates – Third Party Injunctions in Chapter 11 Plans”
- American Bankruptcy Institute, Spring Meeting 2011: “Ethics and Professional Compensation: Actions to Avoid and Recover Fees”
- American Bankruptcy Institute, Southwest Bankruptcy Conference, 2009: “Great Debates – Administration of Administratively Insolvent Estate for the Benefit of a Secured Creditor”
- American Bankruptcy Institute, Spring Meeting 2009: “Great Debates – Sale of Assets Free and Clear of Liens Over the Objection of the Secured Creditor”
- CRG Winter Conference, 2009: “Panel Discussion – Guide for Operating in the Zone of Insolvency”
- American Bankruptcy Institute, Southwest Bankruptcy Conference, 2008: “Claims Trading, Fiduciary Duties and Other Pesky Committee Issues”
- American Bankruptcy Institute, Winter Leadership Meeting, 2006: “Fibermark – New Duties and Beyond – Ethical Problems of Committee Membership and Representation in a Hedge Fund World”
- American Bankruptcy Institute, Spring Meeting 2004: “Successor Liability Revisited – Recent Developments and Trends”

Ms. Karasik received her B.A., with High Honors in History, from the University of California, Berkeley in 1984, and her J.D. from the University of Southern California Law School (Gould School of Law), Order of the Coif, 1991. She was admitted to the California Bar in 1991. She was admitted to the Ninth Circuit Court of Appeals in 1991, the United States District Court for the Central and Northern Districts of California in 1991 and 1992, and the Southern and Eastern Districts of California in 1994. She has also practiced extensively in federal courts throughout the country including in Nevada, Arizona, Utah, Delaware, Washington, Illinois, Missouri, Arizona, Florida and Texas.

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pg 3 of 4



EVE H. KARASIK

PROFESSIONAL RÉSUMÉ

continued from page 3

Ms. Karasik is active in various organizations, including:

- American College of Bankruptcy, (2019–present)
- American Bankruptcy Institute: Executive Committee of Board of Directors (2019–present), Board of Directors 2015–2019), Bankruptcy Battleground West Conference, Co-Chair, 2012–2015, Ethics and Compensation Subcommittee, Education Director, 2014–15, Newsletter Editor, 2012–2014
- Ninth Circuit Judicial Conference Lawyer Representative, 2015–2018
- Los Angeles Bankruptcy Forum, Incoming President (2020–2021), Executive Committee Member 2017 to 2020, Board Member 2014
- Credit Abuse Resistance Education (CARE), Southern California Chapter, Advisory Committee Member and Volunteer 2018–present
- State Bar of California, Business Law Section, Member
- State Bar of California, Insolvency Law Committee, Member, 2005–2006
- LA County Bar Association, Commercial Law and Bankruptcy Section, Member
- Women Lawyers Association of Los Angeles, Former Executive Committee Member
- Turnaround Managers Association (“TMA”) Awards Committee, Member, 2009–2011
- TMA Distressed Investing Conference Planning Committee, Member, 2013–2014



LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P.
LAW OFFICES

PROFESSIONAL RÉSUMÉ

CARMELA T. PAGAY, a partner at LNBY&G, specializes in representation of debtors in reorganizations and liquidations, creditor committees, and Chapter 7 and Chapter 11 trustees, and bankruptcy litigation.

Ms. Pagay received her Bachelor of Arts Degree in Political Science from the University of California, Los Angeles in 1994, and her Juris Doctor from Loyola Law School, Los Angeles in 1997, where she was Senior Production Editor of the *Loyola of Los Angeles International and Comparative Law Journal*. Ms. Pagay is admitted to practice before the United States District Court, Central, Eastern, Northern, and Southern Districts, the Ninth Circuit Court of Appeals, and the United States Supreme Court.

She currently sits on the Women Lawyers Association of Los Angeles Foundation Board of Governors, and is a member of the Los Angeles County Bar Association and the Asian Pacific American Bar Association of Los Angeles County. Ms. Pagay is also a longstanding editorial board member of the *Los Angeles Lawyer* magazine and was its Chair for 2020–2021.



CARMELA T. PAGAY
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LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P.
LAW OFFICES

PROFESSIONAL RÉSUMÉ

JOHN-PATRICK M. FRITZ was named a partner at Levene, Neale, Bender, Yoo & Golubchik L.L.P. in January 2016. Mr. Fritz advises clients as chapter 11 debtors in possession, purchasers, post-petition lenders, creditors, committees, and litigants in bankruptcy related matters. Mr. Fritz is also a Subchapter V Trustee for Chapter 11 Small Business Reorganizations.

Mr. Fritz represents clients in all industries, including start-ups, intellectual property-based companies, hotels and hospitality, commercial real estate, food production, restaurants, retail, manufacturing, construction, and entertainment and film. Combining multi-faceted experience with innovation, Mr. Fritz employs a goal-oriented approach to achieve successful results, whether as counsel to a company reorganizing its affairs, a creditor navigating its best recovery, or as Trustee mediating a reorganization between debtor and creditor parties.

For many years, Mr. Fritz has served on the board of directors for the Los Angeles Bankruptcy Forum, the board of governors and executive committee of the Financial Lawyers Conference, and the advisory board for the American Bankruptcy Institute's annual Bankruptcy Battleground West program. Mr. Fritz is a regular panel speaker on bankruptcy and restructuring issues for various professional and business organizations, and he has received the honor of being named a "Super Lawyer" and "Rising Star" by *Super Lawyers* magazine.

Mr. Fritz served as a judicial law clerk to the Hon. Maureen A. Tighe for two years, from 2007 to 2009, before joining the firm as an associate in 2009. Mr. Fritz graduated Tufts University, *cum laude*, with honors, and Southwestern Law School, *magna cum laude*, in the top 5% of his class. Mr. Fritz studied abroad for one year in Kyoto, worked for the Japanese government in Japan for two years, and is proficient in Japanese.



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PROFESSIONAL RÉSUMÉ

KRIKOR MESHEFEJIAN is a partner at Levene, Neale, Bender, Yoo & Golubchik L.L.P. He represents clients in all aspects of financial reorganization, corporate restructuring, insolvency and commercial litigation. He has helped businesses and individuals successfully and efficiently confirm chapter 11 plans of reorganization, sell assets, negotiate settlements, and litigate complex legal disputes in bankruptcy courts. His clients include financially distressed technology, healthcare, natural resource, restaurant, food processing, real estate investment and other retail, wholesale and service businesses, and all types of individuals seeking appropriate debt relief. He also represents creditors seeking to protect their rights and interests in bankruptcy cases, and trustees in connection with administering bankruptcy cases. He applies a "hands-on" approach to all of his cases and provides his clients with personal attention to all aspects of their case, from inception to conclusion, while focusing on obtaining outstanding results in a cost-effective manner. His creative solutions to complex legal and financial problems have helped his clients preserve their assets and businesses, and protect and enforce their legal rights and claims. He has been selected to the "Rising Star" list every year since 2013, an honor reserved for those lawyers who exhibit excellence in practice.

Prior to joining the firm in 2008, Mr. Meshefejian clerked for the Honorable Geraldine Mund and the Honorable Victoria S. Kaufman, United States Bankruptcy Judges. Mr. Meshefejian obtained his J.D. in 2007, *magna cum laude*, from the University of Illinois College of Law, where he served as senior editor for the Illinois Business Law Journal and received the Rickert Award for excellence in legal writing.



**KRIKOR J.
MESHEFEJIAN**
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PROFESSIONAL RÉSUMÉ

LINDSEY L. SMITH joined LNBYG in February 2010. Ms. Smith obtained her law degree *cum laude* from Loyola Law School, where she was a member of the Alpha Sigma Nu and the St. Thomas More Honor Society, and recipient of the First Honors Award in Election Law. Ms. Smith obtained a B.A. in political science with an emphasis in American Politics from Boston University. Ms. Smith has been named a Super Lawyers Rising Star each year since 2013.

Ms. Smith focuses her practice on the representation of Chapter 11 debtors in possession and Chapter 7 trustees. Ms. Smith has significant experience in successfully representing Chapter 11 debtors from the beginning of a case filing through plan confirmation. Ms. Smith has also represented several Chapter 11 debtors in connection with Section 363 sales of substantially all of their assets.



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pg 1 of 1



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PROFESSIONAL RÉSUMÉ

JEFFREY S. KWONG (鄺世傑) joined LNBYG as an associate in 2014. Mr. Kwong represents Chapter 11 debtors, unsecured creditor committees, secured and unsecured creditors, and parties in bankruptcy litigation and appeals from a variety of industries, including hotels and hospitality, lending and banking, commercial real estate, restaurants, retail, and healthcare. Mr. Kwong's prior Chapter 11 debtor engagements include Cornerstone Apparel, Inc., Anna's Linens, Tala Jewelers, Inc., and Green Fleet Systems, LLC. Further, he has represented commercial landlords in some of the largest retail bankruptcy cases filed across the country in recent years.

Prior to joining the firm, Mr. Kwong served for two years as law clerk to the Honorable Deborah J. Saltzman, United States Bankruptcy Judge for the Central District of California. Mr. Kwong obtained his J.D. in 2012 from the University of California, Berkeley, School of Law, where he served as an editor for the Berkeley Journal of International Law and a Senior Articles Editor for the Asian American Law Journal. He received his undergraduate degree, summa cum laude, from the University of California, San Diego.

Mr. Kwong is a board member of the Asian Pacific CPA Association, a legal advisor to the Soo Yuen Fraternal Association of Southern California, a member of the executive committee of the bankruptcy section of the Beverly Hills Bar Association, a member of the Los Angeles Bankruptcy Forum, and a member of the Turnaround Management Association. He also is a member of the Board of Governors of the Southern California Chinese Lawyers Association (SCCLA), for which he serves on its Legal Clinic and Networking Committees.

Recognitions

- 2022 Recipient of the Hon. Cornelius Blackshear Presidential Fellowship presented by the National Conference of Bankruptcy Judges program
- Recognized in 2021 by the American Bankruptcy Institute as one of the "40 Under 40," Emerging Leaders in Insolvency Practice
- Selected in 2020 as one of 40 "up-and-coming bankruptcy practitioners" to attend the National Conference of Bankruptcy Judges' NextGen program

Speaking Engagements

- "Recent Ethics Developments In Bankruptcy And Litigation," Asian American Bar Association and Asian American Bar Association of New York Program (2023)
- "End Of A Corporate Cycle: Difficult Decisions And Options For Businesses In Financial Distress," Asian Pacific CPA Association, Annual Symposium (2021)
- "Bankruptcy And Alternatives For Businesses During The COVID-19 Era," Asian Pacific CPA Association, Annual Symposium (2020)



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PROFESSIONAL RÉSUMÉ

- “Bumps on the Yellow Brick Road: Entertainment and Intellectual Property Issues in Bankruptcy,” Beverly Hills Bar Association, Luncheon Program (2015)
- “Transitioning to Private Practice,” U.S. Bankruptcy Court, Law Clerk Training (2015)
- “Chambers Survival Tips,” U.S. Bankruptcy Court, Law Clerk Training (2013-2014)

Publications

- Jeffrey S. Kwong, Cortlandt May Signal Acceptance of the “Time Approach” on Landlord Future Rent Claims, Am. Bank. L.J. (June 2023)



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PROFESSIONAL RÉSUMÉ

JOE ROTHBERG joined LNBYG as a partner in 2021. Mr. Rothberg has broad experience across a variety of commercial litigation matters, including in state courts, federal courts, bankruptcy courts, and in private arbitrations. Mr. Rothberg has conducted litigation across a wide assortment of industries, including the textile and apparel industries, the aerospace industry, tech industry, the lending and banking industries, the vending and laundromat industries, the publishing industry, and in the commercial and residential real estate industries. In addition, Mr. Rothberg serves as outside general counsel for a number of small to medium-sized businesses in California and the New York City area.

Before joining the firm, Mr. Rothberg was an attorney at Brutzkus Gubner LLP for nine years. Prior to that, he served as a judicial extern to the Honorable Maureen A. Tighe, United States Bankruptcy Judge for the Central District of California. Mr. Rothberg obtained his J.D. in 2012 from the University of California, Los Angeles, where he served as the managing editor for the UCLA Journal of International Law and Foreign Affairs. He received a Bachelor of Arts in 2008 from the University of California, Berkeley with High Honors in history and a minor in music.

Mr. Rothberg has authored several legal analysis articles for Forbes online, regarding various commercial and intellectual property issues. Mr. Rothberg is licensed to practice in both California and New York. He is a member of the New York State Bar Association. Mr. Rothberg has been named a “Rising Star” by Southern California Super Lawyers each year since 2016, and has been named to the “Up and Coming 100” each year since 2019.



JOSEPH M. ROTHBERG
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PROFESSIONAL RESUME

ROBERT M. CARRASCO joined LNBYG as an associate attorney in May 2023. Before joining LNBYG, Mr. Carrasco was a judicial law clerk for the Hon. Martin R. Barash in the Central District of California-Bankruptcy Court. Prior to that, Mr. Carrasco served as a judicial law clerk for the Hon. Cecelia G. Morris in the Southern District of New York – Bankruptcy Court. Mr. Carrasco also externed and clerked for the Hon. Maureen Tigue in the Central District of California – Bankruptcy Court.

Mr. Carrasco obtained his J.D. from Southwestern Law School. There, Mr. Carrasco served as a lead articles editor for the *Southwestern Law Review*. Mr. Carrasco obtained his B.A from California State University, Long Beach.



Memberships: American Bankruptcy Institute; Mexican American Bar Association; Los Angeles Bankruptcy Forum.



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PROFESSIONAL RÉSUMÉ

YIHAN ALEX SHE joined LNBYG as an associate attorney in March 2024, bringing experience in debt financing from his previous role at an international law firm. He also served as a judicial law clerk for the Honorable Martin R. Barash in the Central District of California Bankruptcy Court. During law school, Mr. She externed for the Honorable Virginia M. Kendall in the United States District Court for the Northern District of Illinois.

Mr. She earned his J.D., cum laude, from Northwestern Pritzker School of Law in 2021, where he served as a senior editor for the *Journal of International Law and Business*. He also holds a B.A. in mathematics from New York University.

Mr. She is admitted to practice law in both California and Illinois. He is a native speaker of Mandarin.



YIHAN ALEX SHE
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PARAPROFESSIONALS

JASON KLASSI received his Bachelors of Arts degree from the University of California at Los Angeles graduating Magna Cum Laude in 1979. He has over 20 years of paralegal experience within the State of California currently working at the law firm of Levene, Neale, Bender, Yoo & Brill L.L.P. since its inception in 1995. Mr. Klassi maintains compliance for paralegal qualification under Business & Professions Code 6450(c)(3) and (d). He also is an active member of the Los Angeles Paralegal Association.

LOURDES CRUZ is a bankruptcy paralegal/legal assistant who received her Associate of Arts degree in computer science from the Institute of Computer Technology College graduating with honors in 1996. Ms. Cruz has been working with law firms specializing in bankruptcy for over 10 years. From 1999 to 2003 she worked for Weinstein, Eisen & Weiss LLP. From 2003 to 2005 she worked for Jeffer, Mangels, Butler & Marmaro LLP. Since August 2005 she has been working with Levene, Neale, Bender, Yoo & Brill L.L.P. Ms. Cruz continues her paralegal education by staying in compliance with MCLE requirements under Business and Professions Code 6450(c)(3) and (d).

CONNIE RAY is a Trustee Administrator/Paralegal who received her Paralegal Certificate from the UCR Extension Paralegal Training Program. She received her bachelor's degree from the University of California, Santa Barbara in 1997. Prior to joining the Firm, she worked for the U.S. Bankruptcy Court, Central District of California, for 12 years, including working as Judicial Assistant to the Honorable Peter H. Carroll from 2002 to 2010.

LISA MASSE received her Bachelor of Arts Degree in Communication Studies at California State University Northridge, graduating with honors. Ms. Massee has been working with law firms specializing in bankruptcy for the past 20 years. She was employed by the law firm of Stutman, Treister & Glatt, Professional Corporation from January 2001 until April 2014. In May 2014, she joined the firm of Levene, Neale, Bender, Yoo & Brill, L.L.P. Ms. Massee continues her paralegal education by maintaining MCLE compliance.

DAMON WOO is a bankruptcy paralegal/legal assistant who received his Legal Assistant Training from the Beverly Hills Bar Association. Mr. Woo has been working for Levene, Neale, Bender, Yoo & Golubchik, L.L.P. since November 1999. Mr. Woo continues his paralegal education by staying in compliance with MCLE requirements under Business and Professions Code 6450(c)(4) and (d).

REBECKA MERRITT received her Bachelor of Science Degree in Integrative Studies at Kennesaw State University. Ms. Merritt has been working with law firms for the past six years. She was employed by The Zagoria Law Firm, a Personal Injury firm in Atlanta, Georgia, as a legal assistant/paralegal from January 2018 until February 2022. Ms. Merritt was also employed as a legal secretary at Moray & Agnew Law Firm in Newcastle, Australia, in Property Law, from July 2022 until January 2023. In January 2023, she joined the firm of Levene, Neale, Bender, Yoo & Golubchik, L.L.P. Ms. Merritt continues her paralegal education by maintaining MCLE compliance.

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SCHEDULE OF HOURLY BILLING RATES
(Effective January 1, 2024)

<u>ATTORNEYS</u>	<u>2024 Rates</u>
DAVID L. NEALE	725
RON BENDER	725
TIMOTHY J. YOO	725
DAVID B. GOLUBCHIK	725
EVE H. KARASIK	725
GARY E. KLAUSNER	725
EDWARD M. WOLKOWITZ	725
BETH ANN R. YOUNG	725
MONICA Y. KIM	700
PHILIP A. GASTEIER	700
DANIEL H. REISS	695
TODD A. FREALY	695
KURT RAMLO	695
RICHARD P. STEELMAN, JR.	695
JULIET Y. OH	695
TODD M. ARNOLD	695
KRIKOR J. MESHEFEJIAN	695
JOHN-PATRICK M. FRITZ	695
JOSEPH M. ROTHBERG	695

MICHAEL D'ALBA	695
CARMELA T. PAGAY	680
ANTHONY A. FRIEDMAN	680
JEFFREY KWONG	665
LINDSEY L. SMITH	625
ALEX SHE	495
ROBERT CARRASCO	495
PARAPROFESSIONALS	300

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 2818 La Cienega Avenue, Los Angeles, CA 90034.

A true and correct copy of the foregoing document entitled **Fourth Interim Application Of Levene, Neale, Bender, Yoo & Golubchik L.L.P. For Approval Of Fees And Reimbursement Of Expenses; Declaration Of David B. Golubchik In Support Thereof** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **November 14, 2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On **November 14, 2024**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

None. Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **November 14, 2024**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

November 14, 2024
Date

Rebecka Merritt
Type Name

/s/ Rebecka Merritt
Signature

1 **NEF SERVICE LIST:**

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- 3 • Todd M Arnold tma@lnbyg.com
- 4 • Jerrold L Bregman jbregman@bg.law, ecf@bg.law
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